U.S. ENVIRONMENTAL PROTECTION AGENCY
Region 5, Land and Chemicals Division
RCRA Branch, LR-8J
77 West Jackson Boulevard
Chicago, Illinois 60604

RCRA SAMPLING REPORT

INSPECTION DATE:	May 4, 2017
SITE NAME:	Container Life Cycle Management, LLC d/b/a Mid-America Steel Drum, Inc.
ADDRESS:	3950 South Pennsylvania Avenue St. Francis, Wisconsin 53235
EPA ID NUMBER:	WIR 000 131 367
RCRA STATUS:	Small Quantity Generator (2017)
NAICS CODE:	332439 Other Metal Container Manufacturing
FACILITY CONTACT:	Mark Furgason Plant Manager
EPA CONTACT:	Brian Kennedy Environmental Engineer Compliance Section 2 RCRA Branch Land and Chemicals Division

PREPARED BY: _____ 7/7/2017
Brian Kennedy **Date**

APPROVED BY: _____ 7/7/17
Julie Morris, Chief **Date**
Compliance Section 2

Mid-America Steel Drum, Inc.
WIR 000 131 367
May 4, 2017

Purpose of Inspection

An unannounced sampling event at Mid-America Steel Drum, Inc. (MASD), located at 3950 South Pennsylvania Avenue in St. Francis, Wisconsin, took place May 4, 2017. The sampling event was conducted by U.S. Environmental Protection Agency personnel as part of an investigation of the facility's compliance with the regulations of the Resource Conservation and Recovery Act (RCRA), as codified in the Wisconsin Administrative Code and the Code of Federal Regulations. Simultaneous sampling events of additional Mid-America Steel Drum, Inc. facilities in Oak Creek and Milwaukee, Wisconsin took place on the same day. The details of the sampling events at the Oak Creek and Milwaukee facilities are not covered in this report.

Participants

The following persons were present for part or all of the inspection:

Mark Furgason – Plant Manager	MASD
Robert Janowski – Plant Engineer	MASD
Linda Benfield – Attorney for MASD	Foley and Lardner, LLP
Brian Kennedy – Environmental Engineer	U.S. EPA
Jamie Paulin – Chemist	U.S. EPA
Alexandra Letuchy – Environmental Engineer	U.S. EPA
Manojkumar Patel – Environmental Engineer	U.S. EPA

Pre-Site Visit

Prior to the sampling event, EPA inspectors completed a Health and Safety Plan (HASP), a Sampling Analysis Plan (SAP), and a Quality Assurance Project Plan (QAPP). An *ex parte* administrative warrant from the United States District Court for the Eastern District of Wisconsin was procured on May 2, 2017.

Introduction

EPA inspectors Paulin, Letuchy, Patel and myself arrived on site at approximately 10:00 AM CST. There was a strong chemical odor on the public roads surrounding the facility upon arrival. Entering the front office, we presented the administrative warrant to Ms. Tiffany Hupp, MASD's Office Manager. We explained the purpose of the warrant and our site visit, and that we intended to sample at the facility that day. We also explained the administrative warrant allowed for immediate access to the facility. Ms. Hupp claimed she needed to make several calls before allowing us on site. We expressed our disagreement with this decision.

While waiting for permission to enter the site, Inspector Paulin took photos of the north side of the facility from the sidewalk on South Pennsylvania Avenue (See Attachment A: Photos 1 and 2). Semi-trailers were observed parked along a north-side loading dock.

After several minutes of delay, I called Mr. Michael Carter, Assistant United States Attorney for the Eastern District of Wisconsin, to explain that we were not allowed immediate access to the site after presenting the warrant. Mr. Carter was eventually put in contact by phone with Ms. Linda Benfield, MASD's Attorney of Foley and Lardner, LLP, to discuss the situation. After several minutes of discussion, Ms. Hupp stated that we could enter the facility. At 10:25 AM, Mr. Mark Furgason, MASD's Plant Manager, arrived to the front office and escorted us on site.

Initial Site Tour

EPA inspectors Paulin, Letuchy, Patel and myself were first directed by Mr. Furgason to MASD's outdoor loading and "heavies" dock on the north side of the facility. Here, MASD employees unload incoming 55-gallon drums for sorting and processing (Photographs 3 – 6). The only drums handled here are steel closed-top drums. We observed MASD employees shake and "feel" the 55-gallon drums to determine if they contained any material. Those drums determined to contain little to no material were rolled to the nearby conveyor line, which led inside the facility for processing. Inspector Paulin and I examined several of the numerous drums on the outdoor portion of the conveyor line, and those about to be placed on the conveyor. The drums we examined to did not appear to contain material.

For those drums determined to contain material, MASD employees place them on the east side of the loading dock in the "heavies" area. These rejected drums are referred to as "heavies." We observed approximately 103 heavy drums stored in this area (Photographs 7 – 10). The drums were packed together closely and it was difficult to examine drum labels or tags. MASD placed yellow tags on the heavy drums with numbers that denote the customer that sent the drum (Photograph 11). Some, but not all, of the yellow tags were marked with the date of arrival of the drum to MASD. Dates from April 2017 were observed on those drums that were dated. Inspector Paulin and I selected and marked seven heavy drums from this area to be sampled (Photograph 12). The drums were selected, in part, because of labeling indicative of hazardous materials.

At this time, Mr. Furgason and Inspectors Patel and Letuchy proceeded inside the facility. Inspectors Patel and Letuchy later departed MASD in the early afternoon. Mr. Robert Janowski, MASD's Plant Engineer, joined Inspector Paulin and I on the heavies dock.

After selecting and marking the seven heavy drums for sampling, Mr. Janowski led Inspector Paulin and I inside the facility through a north-side entrance near the heavies storage area. Upon entrance, the chemical odor noted outside the facility intensified. We observed a standing fog or haze inside the facility (Photographs 13 – 14). It was unclear from where the fog was originating. Mr. Janowski led us through MASD's poly (plastic) drum loading areas along the east side of the facility. Here, MASD employees also "feel" incoming poly drums to determine if they are heavy. I examined approximately four of the numerous poly drums placed on the conveyor line leading to processing. The drums I examined did not appear to contain material.

At the southeast corner of the facility we observed a hazardous waste storage area. There were 13 55-gallon drums and two 5-gallon containers marked as hazardous waste and dated. We also observed five open buckets in the area that were covered in plastic and did not appear labeled (Photographs 15 – 19). The 55-gallon drums in the area had markings on their lids which stated "Mercury Wash Water." All hazardous waste labels in the area were marked as D009 hazardous

waste for mercury content. We asked Mr. Janowski the source of this waste. He stated that SET Environmental was hired to come to the facility on weekends to perform cleaning of MASD equipment, and that this waste was generated during the cleaning event(s). Mr. Janowski could not provide further information on the source of the mercury.

The tour continued west along the south side of the facility. We observed four large cardboard boxes across from MASD's wastewater treatment area that were labeled as hazardous waste for mercury (Photographs 20 – 21). Mr. Janowski was unsure of the source of the waste, but stated it might be filter cake from wastewater treatment operations. Adjacent to these four boxes were four 55-gallon drums that were labeled as hazardous waste for mercury (Photograph 22). One 55-gallon drum near these four hazardous waste drums had its lid marked as "Boots" (partially visible in Photograph 22). Mr. Janowski stated this drum contained the boots of MASD employees that were contaminated with mercury. This drum did not have a hazardous waste label. Another 55-gallon drum near the four hazardous waste drums was not labeled and was covered with tape (Photograph 23). Mr. Janowski stated the drum contained mercury waste. The drum was not labeled as hazardous waste.

Continuing west along the south side of the facility, near the wastewater treatment area, we observed four 55-gallon drums that were labeled as non-hazardous waste (Photographs 24 – 25). Mr. Janowski stated this waste was material that had accumulated along the bottom of machinery in MASD's process line. Two of these drums were marked to be sampled.

Mr. Janowski briefly directed us through MASD's steel drum processing line, which is on a raised steel catwalk above the ground level. Along the north side of the facility, MASD blasts cleaned drums with steel shot as part of the reconditioning process. Shot blast dust from a dust collector is accumulated in 55-gallon drums and shipped off-site as a non-hazardous waste. MASD stages 55-gallons of this dust for shipment near the center of its steel drum processing line. We observed at least a dozen of these drums in the area. One of these drums was marked to be sampled.

Around this time, Ms. Linda Benfield, MASD's Attorney, arrived on site and joined the tour. Ms. Benfield requested that split samples be taken for all samples. MASD provided its own jars to collect split samples.

Inspector Paulin and I returned to our vehicle to ready sampling equipment and don protective gear. The pre-marked drums on the heavies dock were sampled first, and staging was completed for each drum prior to sampling (Photograph 26). Sampling was then conducted on those pre-marked drums near the wastewater treatment area inside the south end of the facility, and then on the pre-marked drum in the shot blast dust storage area in the center of the facility.

Mr. Janowski and Ms. Benfield were present for the duration of sampling activities.

Sampling – Heavies Dock

All drums on the heavies dock were sampled using the following equipment: Glass Coliwasa samplers, pH paper, a ruler, 16 oz. glass jars, drums covers, a bung wrench, and a Multi-Rae. A split sample for MASD was taken for each sample.

The following table summarizes the notes and observations made during the sampling conducted on the heavies dock:

Sample No.	Time Taken (CST)	Depth of Waste in Container	Approx. pH	Additional Observations	Photo Numbers
SFS01	1:06 PM	2 inches	1	Black poly drum marked "Sulfuric Acid." Four aliquots per sample jar. Limited sample material available.	27 – 31
SFS02	1:20 PM	3 inches	8	Blue poly drum with corrosive and flammable markers. Four aliquots per sample jar. Limited sample material available.	32 – 36
SFS03	1:31 PM	2.5 inches	6	Blue poly drum marked as MDG ZymoBac GTLS 10x. Four aliquots per sample jar. Limited sample material available.	37 – 40
SFS04	1:39 PM	2 inches	6	Blue steel drum marked "Toluene." Multi-Rae hit 300 ppm VOCs. Four aliquots per sample jar. Limited sample material available.	41 – 44
SFS05	N/A	N/A	1	Black poly drum marked "Muriatic Acid." When bung opened, vigorous fume/smoke exited. Fumes turned pH paper bright red. **Decided not to sample as a precaution.**	45 – 48
SFS06	1:55 PM	3.2 inches	1	Black poly drum marked "Muriatic Acid." Four aliquots per sample jar. Limited sample material available.	49 – 52
SFS07	2:03 PM	2.75 inches	6	Green steel drum marked "EtOH / Triethyl Citrate Kosher" and flammable. Four aliquots per sample jar. Limited sample material available.	53 – 55

Sampling – Near Wastewater Treatment Area

Two drums in this area were sampled using the following equipment: Glass Coliwasa samplers, pH paper, 16 oz. glass jars, and a Multi-Rae. A split sample for MASD was taken for each sample. Mr. Janowski opened these drums at our request.

The following table summarizes the notes and observations made during the sampling conducted in this area:

Sample No.	Time Taken (CST)	Approx. pH	Additional Observations	Photo Number
SFS08	3:10 PM	10	Black steel open-top drum marked as "Non-Hazardous Waste." Material was brown in color with a sludgy consistency. Liquid had separated to form a thin top layer. Drum was almost full. Two full 16 oz. jars taken.	56 – 59
SFS09	3:23 PM	10	Black steel open-top drum marked as "Non-Hazardous Waste." Material was brown in color with a sludgy consistency. Liquid had separated to form a thin top layer. Drum was almost full. Two full 16 oz. jars taken.	60 – 62

Sampling – Shot Blast Dust Storage Area

One drum in this area were sampled using the following equipment: Plastic scoops and 16 oz. glass jars. A split sample for MASD was taken. Mr. Janowski opened this drum at our request.

Sample No.	Time Taken (CST)	Additional Observations	Photo Number
SFS10	3:37 PM	Red steel open-top drum with no clear marking or label Material was a very fine gray dust. Drum was almost full. Two full 16 oz. jars taken with three scoops per jar	63 – 64
SFS10 Dup	3:37 PM	Red steel open-top drum with no clear marking or label Material was a very fine gray dust. Drum was almost full. Two full 16 oz. jars taken with three scoops per jar.	63 – 64

Sampling Completion

After sampling was completed, Inspector Paulin and I proceeded to bag and tag the samples. We prepared a chain of custody form for the samples in addition to a sample receipt for MASD. Mr. Furgason signed the sample receipt and copies of both documents were left with MASD. A copy of the receipt for samples and chain of custody form is in Attachment B.

Inspector Paulin and I left the facility at approximately 5:30 PM.

NOTE: When available, sample results will be placed in Attachment C.

Attachments

A. Photographs
B. Sample Receipt and Chain of Custody
C. Sample Results (Pending)

Photographs for MASD St. Francis 5/4/2017

Media: RCRA

Disk Number 1
Photo Number 1
Photo Filename DSCN1061.JPG
Date/Time 5/4/2017
10:23:00 AM
Photographer Jamie Paulin

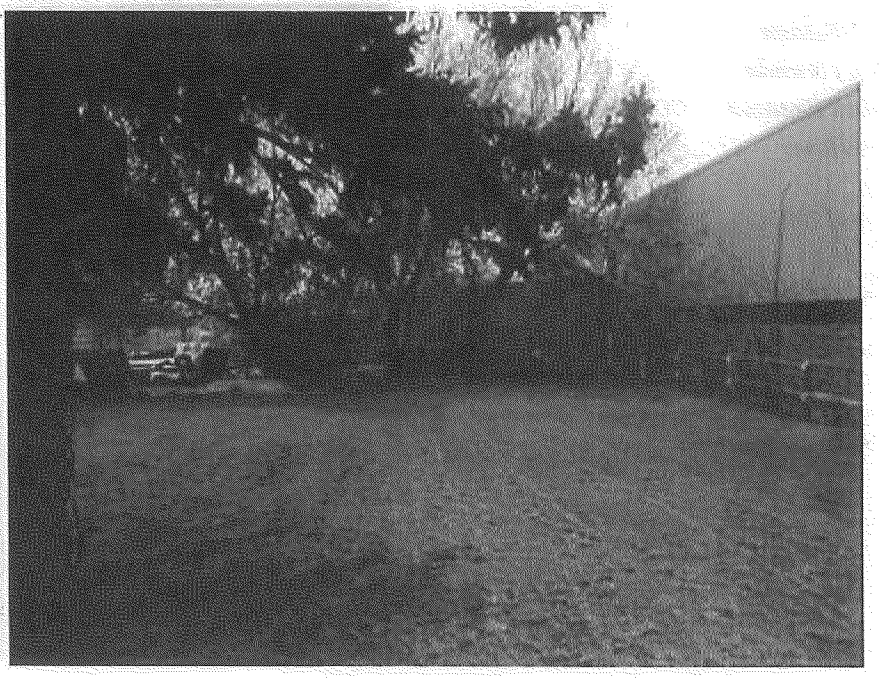
Description

Northside dock. View from Pennsylvania Avenue. Trucks were parked at the dock where 55-gallon containers were being off-loaded.

Disk Number 1
Photo Number 2
Photo Filename DSCN1062.JPG
Date/Time 5/4/2017
10:23:00 AM
Photographer Jamie Paulin

Description

Northside dock. View from Pennsylvania Avenue. Trucks were parked at the dock where 55-gallon containers were being off-loaded.



Photographs for MASD St. Francis 5/4/2017

Media: RCRA

Disk Number 1
Photo Number 3
Photo Filename DSCN1063.JPG
Date/Time 5/4/2017 10:38:00 AM
Photographer Jamie Paulin

Description

Northside Dock. Stacks of empty 55-gallon containers were being stored in this location.

Disk Number 1
Photo Number 4
Photo Filename DSCN1064.JPG
Date/Time 5/4/2017 10:39:00 AM
Photographer Jamie Paulin

Description

Northside Dock. Stacks of empty 55-gallon containers were being stored in this location. Some had been washed but were being rejected.

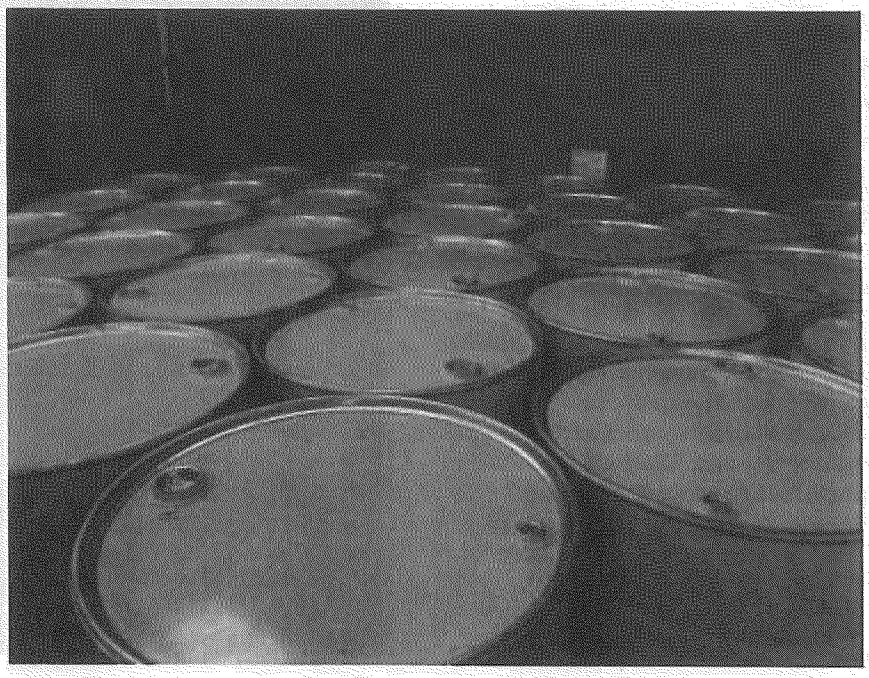
Photographs for MASD St. Francis 5/4/2017

Media: RCRA

Disk Number 1
Photo Number 5
Photo Filename DSCN1065.JPG
Date/Time 5/4/2017 10:40:00 AM
Photographer Jamie Paulin

Description

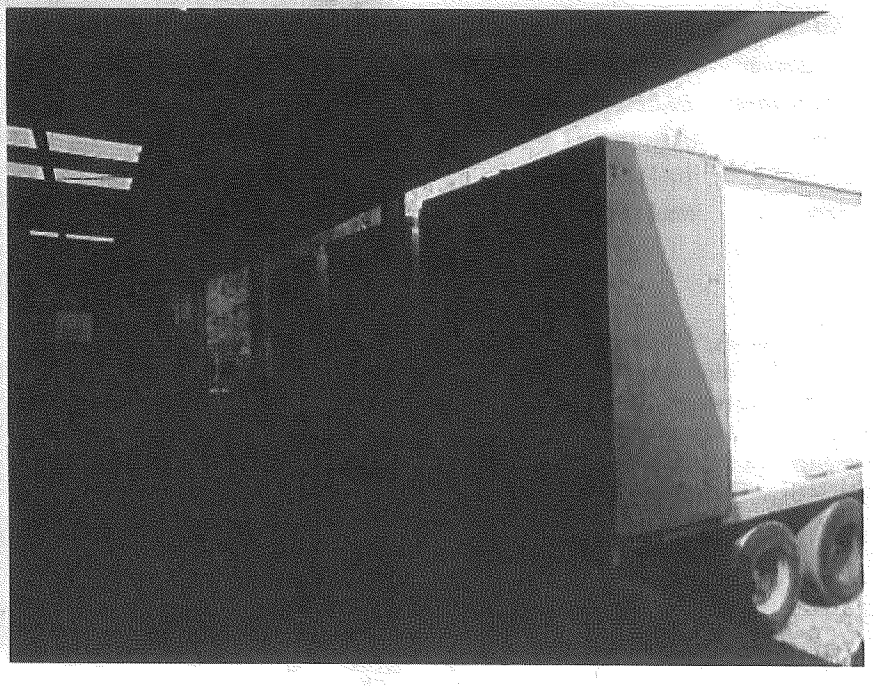
Northside dock - storage prior to conveyor belt. Several metal 55-gallon containers were being off-loaded at the time of the sampling event. These metal drums felt emtpy and appeared to be empty.



Disk Number 1
Photo Number 6
Photo Filename DSCN1066.JPG
Date/Time 5/4/2017 10:41:00 AM
Photographer Jamie Paulin

Description

Northside dock. Several trailers of 55-gallon containers were being off-loaded at the time of the sampling event.



Photographs for MASD St. Francis 5/4/2017

Media: RCRA

Disk Number 1
Photo Number 7
Photo Filename DSCN1067.JPG
Date/Time 5/4/2017
10:41:00 AM
Photographer Jamie Paulin

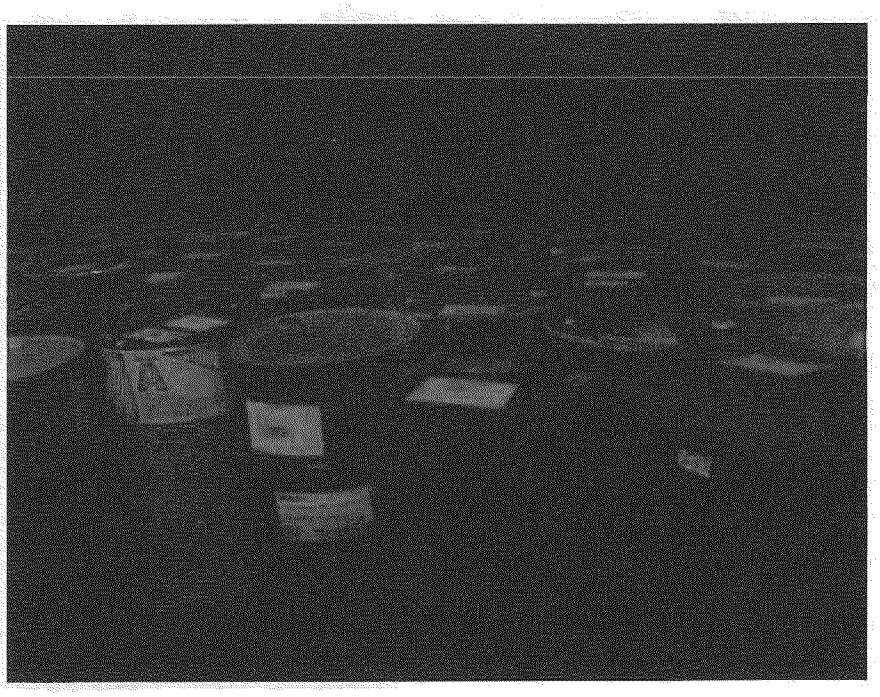
Description

Storage of "heavies." About 103 x 55-gallon containers were being stored in this location awaiting removal from customers. There was no aisle space and it was difficult to read the assigned tag numbers. Each customer received a number assigned per drum.

Disk Number 1
Photo Number 8
Photo Filename DSCN1068.JPG
Date/Time 5/4/2017
10:41:00 AM
Photographer Jamie Paulin

Description

Storage of "heavies." About 103 x 55-gallon containers were being stored here awaiting removal from customers. There was no aisle space and it was difficult to read the assigned tag numbers. Each customer received a number assigned per drum - yellow tag.



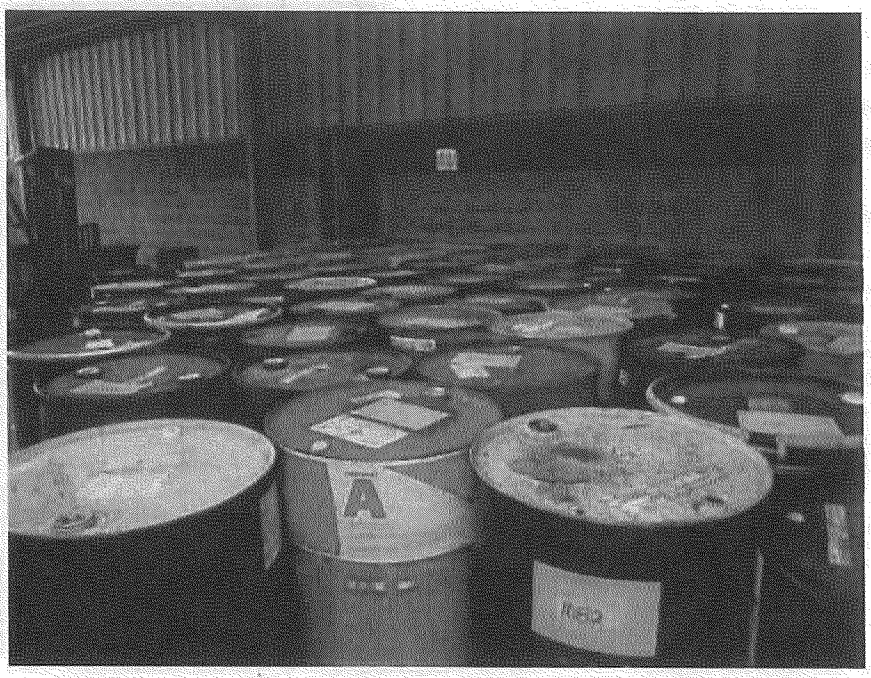
Photographs for MASD St. Francis 5/4/2017

Media: RCRA

Disk Number 1
Photo Number 9
Photo Filename DSCN1069.JPG
Date/Time 5/4/2017
10:41:00 AM
Photographer Jamie Paulin

Description

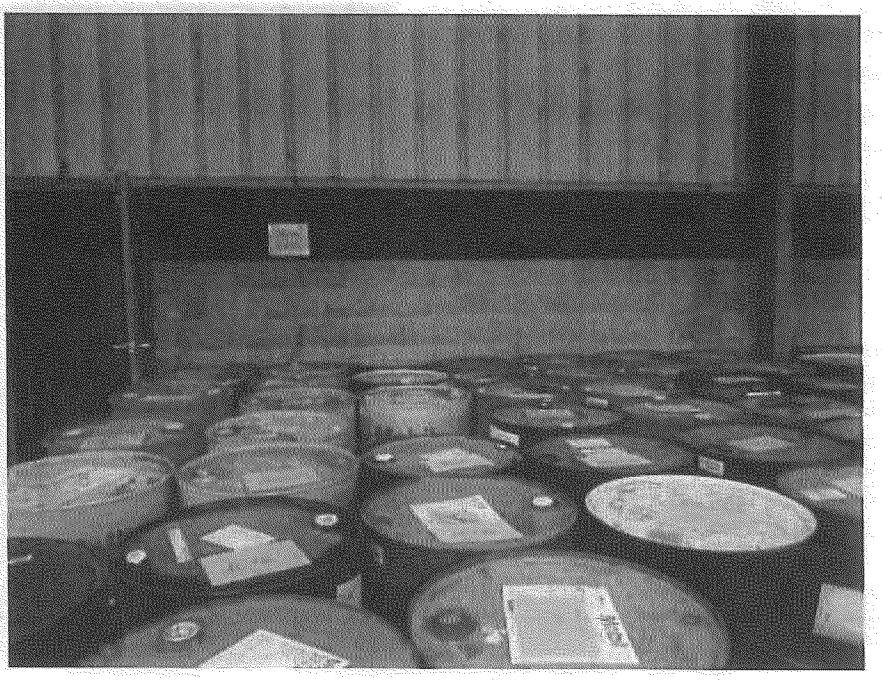
Storage of "heavies." About 103 x 55-gallon containers were being stored here awaiting removal from customers. There was no aisle space and it was difficult to read the assigned tag numbers. Each customer received a number assigned per drum - yellow tag.



Disk Number 1
Photo Number 10
Photo Filename DSCN1070.JPG
Date/Time 5/4/2017
10:43:00 AM
Photographer Jamie Paulin

Description

Storage of "heavies." About 103 x 55-gallon containers were being stored here awaiting removal from customers. There was no aisle space and it was difficult to read the assigned tag numbers. Each customer received a number assigned per drum - yellow tag.



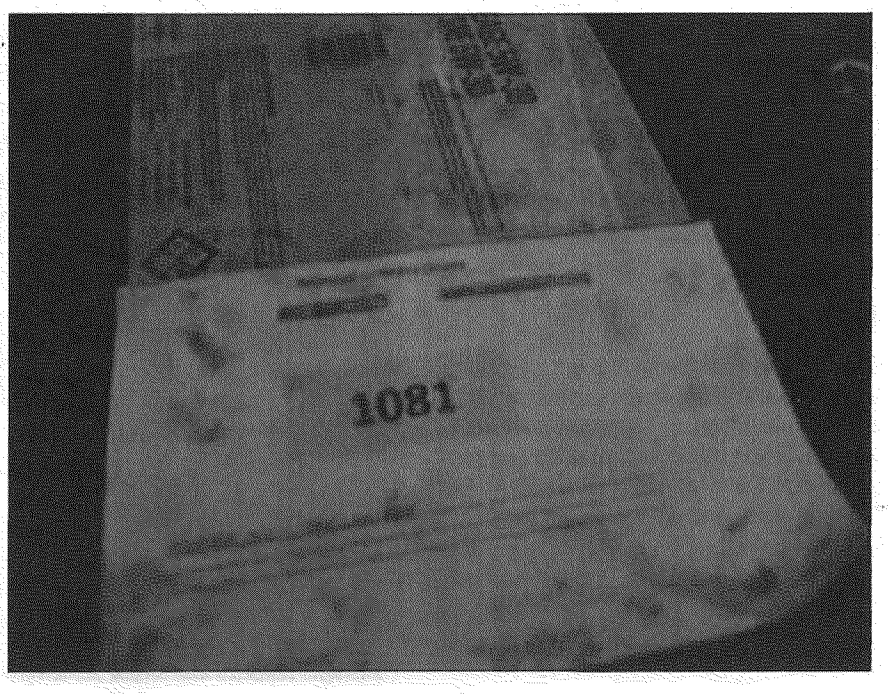
Photographs for MASD St. Francis 5/4/2017

Media: RCRA

Disk Number 1
Photo Number 11
Photo Filename DSCN1071.JPG
Date/Time 5/4/2017 10:45:00 AM
Photographer Jamie Paulin

Description

Storage of "heavies." Each 55-gallon container was assigned a tag number placed on top of each drum associated with a customer. One of the drums per tag number was dated. This tag was dated 4/28/17.



Disk Number 1
Photo Number 12
Photo Filename DSCN1072.JPG
Date/Time 5/4/2017 10:59:00 AM
Photographer Jamie Paulin

Description

Storage of "heavies." Seven 55-gallon containers were selected from the "heavies" storage area to sample, based on hazardous material labeling. The drums were not labeled as hazardous waste nor did they contain a date. 1 did not contain a tag number label

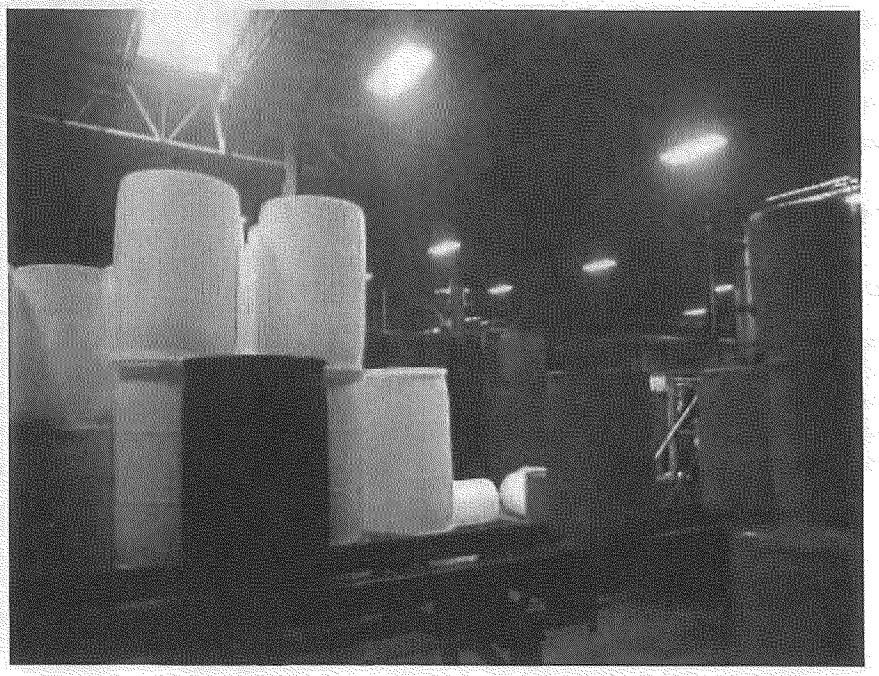
Photographs for MASD St. Francis 5/4/2017

Media: RCRA

Disk Number 1
Photo Number 13
Photo Filename DSCN1073.JPG
Date/Time 5/4/2017 11:08:00 AM
Photographer Jamie Paulin

Description

Poly drum process area. Stacks of empty poly 55-gallon containers were being loaded onto the conveyor belt for processing. The air was foggy and misty. There was a strong odor inside the facility.



Disk Number 1
Photo Number 14
Photo Filename DSCN1074.JPG
Date/Time 5/4/2017 11:08:00 AM
Photographer Jamie Paulin

Description

Poly drum process area. Stacks of empty poly 55-gallon containers were being loaded onto the conveyor belt for processing. The air was foggy and misty. There was a strong odor inside the facility.

Photographs for MASD St. Francis 5/4/2017

Media: RCRA

Disk Number 1
Photo Number 15
Photo Filename DSCN1075.JPG
Date/Time 5/4/2017 11:16:00 AM
Photographer Jamie Paulin

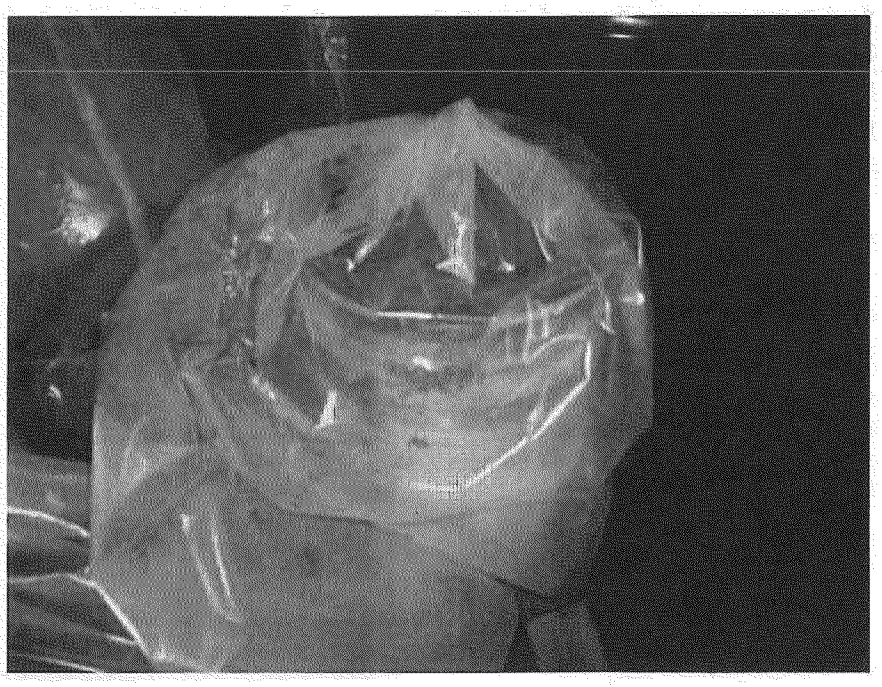
Description

Hazardous waste storage area. Waste that had been collected by cleaning off of and under equipment was stored in 5 open buckets tied in a plastic bag with no lids, labels or dates.

Disk Number 1
Photo Number 16
Photo Filename DSCN1076.JPG
Date/Time 5/4/2017 11:16:00 AM
Photographer Jamie Paulin

Description

Hazardous waste storage area. Waste that had been collected by cleaning off of and under equipment was stored in 5 open buckets. The buckets were tied in a plastic bag with no lids, labels or dates.



Photographs for MASD St. Francis 5/4/2017

Media: RCRA

Disk Number 1
Photo Number 17
Photo Filename DSCN1077.JPG
Date/Time 5/4/2017 11:18:00 AM
Photographer Jamie Paulin

Description

Hazardous waste storage area. 13 x 55-gallon containers and 2 x 5-gallon containers were labeled as hazardous waste and were being stored in this area. SET cleaned the equipment over the previous weekend and stored the hazardous waste in this area.

Disk Number 1
Photo Number 18
Photo Filename DSCN1078.JPG
Date/Time 5/4/2017 11:18:00 AM
Photographer Jamie Paulin

Description

Hazardous waste storage area. 13 x 55-gallon containers and 2 x 5-gallon containers were labeled as hazardous waste and were being stored in this area. SET cleaned the equipment over the previous weekend and stored the hazardous waste in this area.

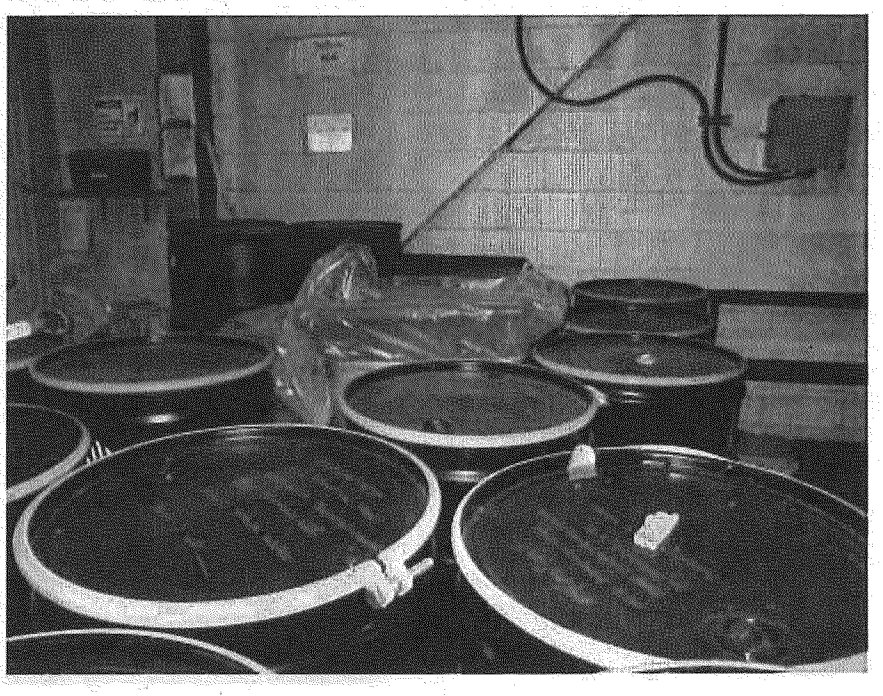
Photographs for MASD St. Francis 5/4/2017

Media: RCRA

Disk Number 1
Photo Number 19
Photo Filename DSCN1079.JPG
Date/Time 5/4/2017 11:21:00 AM
Photographer Jamie Paulin

Description

Hazardous waste storage area. 13 x 55-gallon containers and 2 x 5-gallon containers were labeled as hazardous waste and were being stored in this area. SET cleaned the equipment over the previous weekend and stored the hazardous waste in this area.



Disk Number 1
Photo Number 20
Photo Filename DSCN1080.JPG
Date/Time 5/4/2017 11:24:00 AM
Photographer Jamie Paulin

Description

Conveyor belt located across from waste water treament unit (WWTU) area. 4 cardboard totes were being stored with hazardous waste labels. Robert Janowski did not know the source of the waste. He stated that it might be WWTU filter cake.

Photographs for MASD St. Francis 5/4/2017

Media: RCRA

Disk Number 1
Photo Number 21
Photo Filename DSCN1081.JPG
Date/Time 5/4/2017 11:24:00 AM
Photographer Jamie Paulin

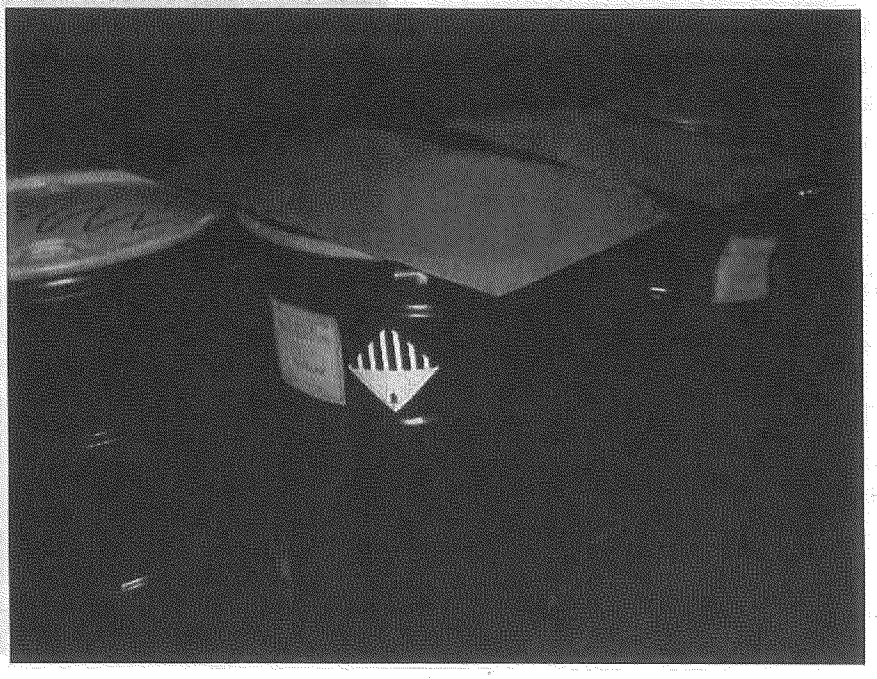
Description

Conveyor belt located across from waste water treament unit (WWTU) area. 4 cardboard totes were being stored with hazardous waste labels. Robert Janowski did not know the source of the waste. He stated that it might be WWTU filter cake.

Disk Number 1
Photo Number 22
Photo Filename DSCN1082.JPG
Date/Time 5/4/2017 11:25:00 AM
Photographer Jamie Paulin

Description

Near the process area and WWTU. 4 x 55-gallon containers were labeled as hazardous waste for mercury contamination. One 55-gallon container was storing mercury contaminated boots; however did not contain a hazardous waste label.



Photographs for MASD St. Francis 5/4/2017

Media: RCRA

Disk Number 1
Photo Number 23
Photo Filename DSCN1083.JPG
Date/Time 5/4/2017 11:26:00 AM
Photographer Jamie Paulin

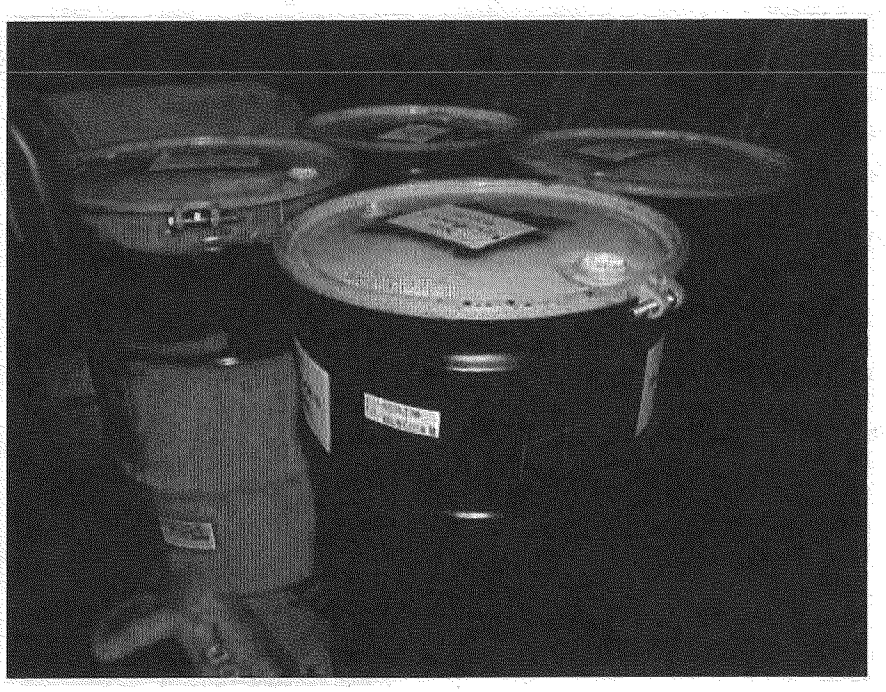
Description

Near the process area and WWTU. One 55-gallon container was being stored without labeling and sealed with tape rather than with a lid. Robert Janowski stated that the container was storing mercury contaminated waste.

Disk Number 1
Photo Number 24
Photo Filename DSCN1084.JPG
Date/Time 5/4/2017 11:28:00 AM
Photographer Jamie Paulin

Description

Near the process area and WWTU. Four x 55-gallon containers were being stored as non-hazardous waste. Robert Janowski stated that the waste was collected from the bottom of machinery. The drum we labeled as "H" was sampled.



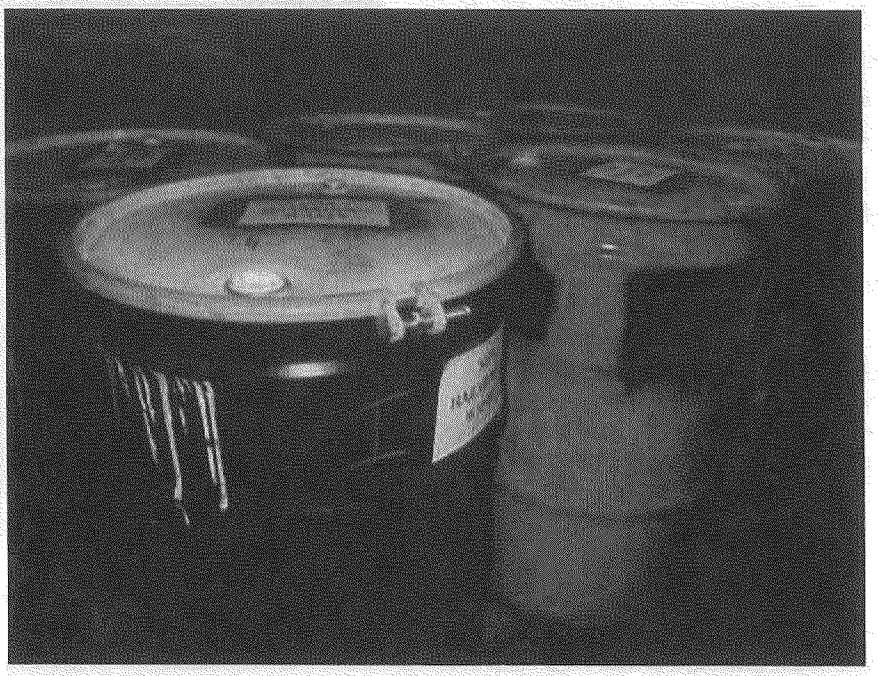
Photographs for MASD St. Francis 5/4/2017

Media: RCRA

Disk Number 1
Photo Number 25
Photo Filename DSCN1085.JPG
Date/Time 5/4/2017 11:30:00 AM
Photographer Jamie Paulin

Description

Near the process area and WWTU. Six x 55-gallon containers were being stored as non-hazardous waste. Robert Janowski stated that the waste was collected from the bottom of machinery. The drum we labeled as "I" was sampled.



Disk Number 1
Photo Number 26
Photo Filename DSCN1086.JPG
Date/Time 5/4/2017 12:57:00 PM
Photographer Jamie Paulin

Description

Storage of "heavies." Seven 55-gallon containers were staged and prepared to be sampled with coliwasas.

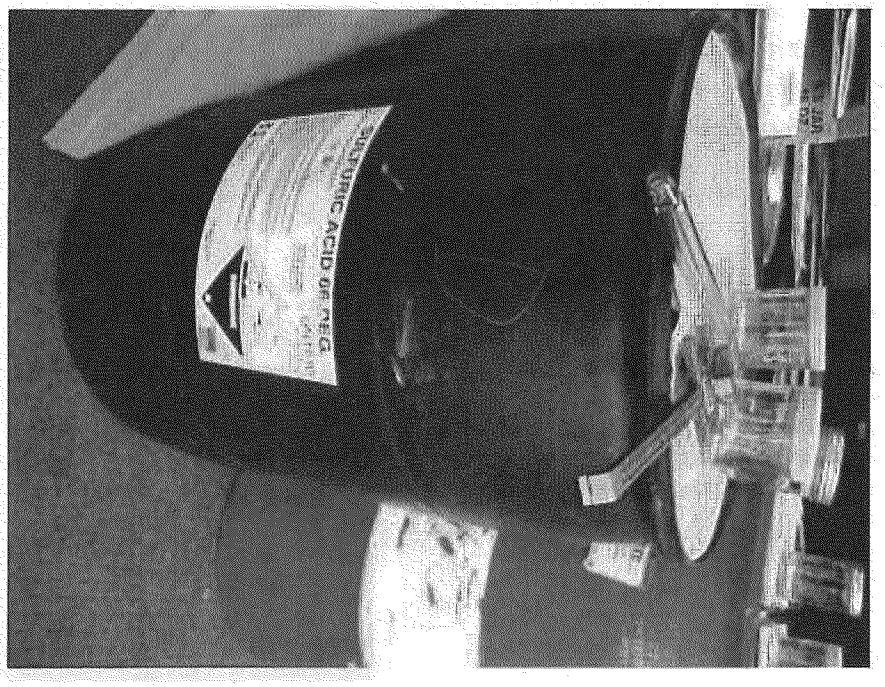
Photographs for MASD St. Francis 5/4/2017

Media: RCRA

Disk Number 1
Photo Number 27
Photo Filename DSCN1087.JPG
Date/Time 5/4/2017 12:58:00 PM
Photographer Jamie Paulin

Description

Storage of "heavies." One 55-gallon container was labeled as sulfuric acid. SFS01. Sampled 1:06pm. Level of contents was 2 inches. pH paper showed pH of 1. 4 aliquots each sample jar. Split taken.



Disk Number 1
Photo Number 28
Photo Filename DSCN1088.JPG
Date/Time 5/4/2017 1:06:00 PM
Photographer Jamie Paulin

Description

Storage of "heavies." One 55-gallon container was labeled as sulfuric acid. SFS01. Sampled 1:06pm. Level of contents was 2 inches. pH paper showed pH of 1. 4 aliquots each sample jar. Split taken.

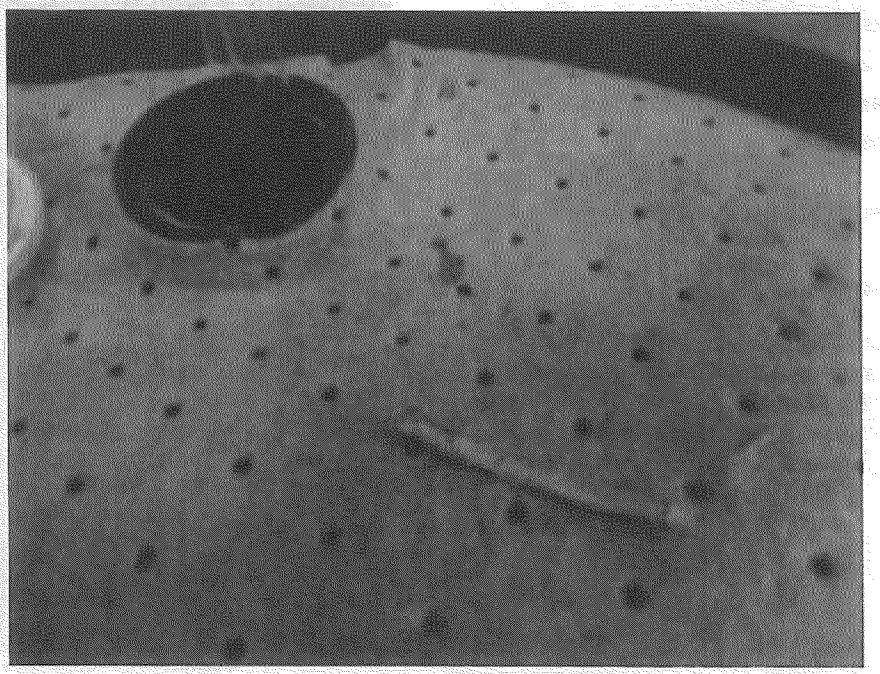
Photographs for MASD St. Francis 5/4/2017

Media: RCRA

Disk Number 1
Photo Number 29
Photo Filename DSCN1089.JPG
Date/Time 5/4/2017 1:08:00 PM
Photographer Jamie Paulin

Description

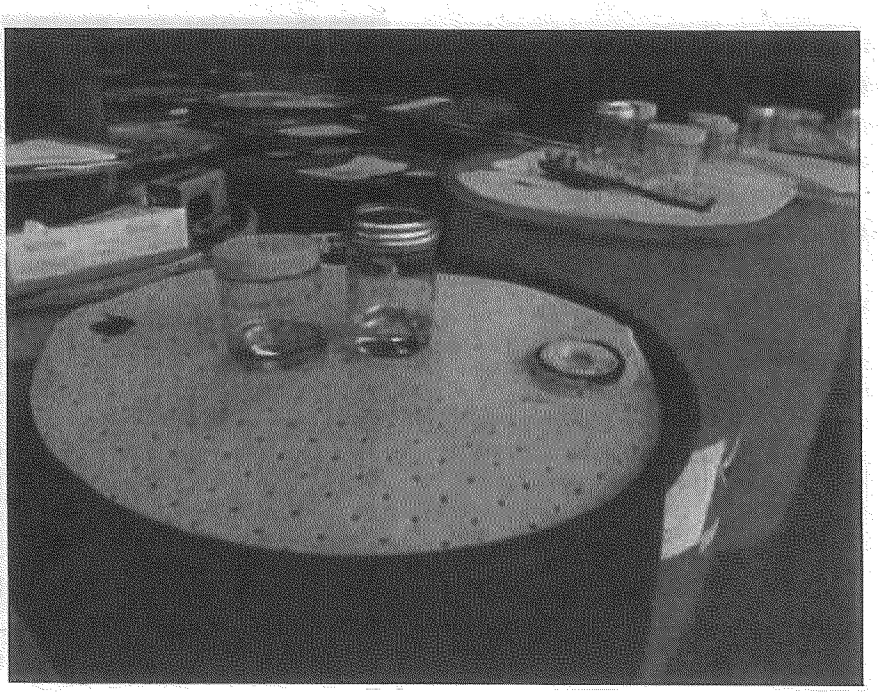
Storage of "heavies." One 55-gallon container was labeled as sulfuric acid. SFS01. Sampled 1:06pm. Level of contents was 2 inches. pH paper showed pH of 1. 4 aliquots each sample jar. Split taken.



Disk Number 1
Photo Number 30
Photo Filename DSCN1090.JPG
Date/Time 5/4/2017 1:14:00 PM
Photographer Jamie Paulin

Description

Storage of "heavies." One 55-gallon container was labeled as sulfuric acid. SFS01. Sampled 1:06pm. Level of contents was 2 inches. pH paper showed pH of 1. 4 aliquots each sample jar. Split taken.



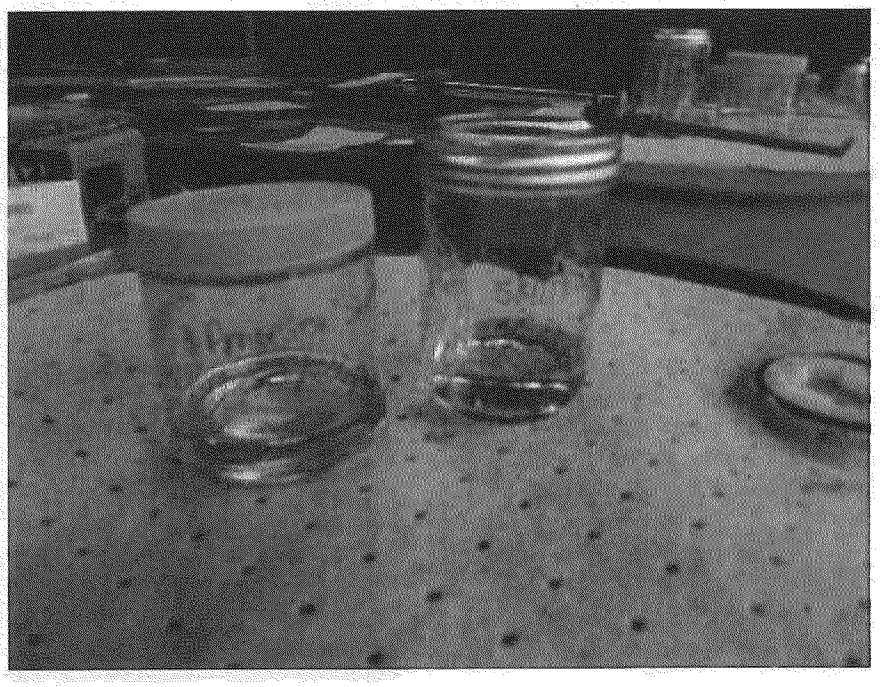
Photographs for MASD St. Francis 5/4/2017

Media: RCRA

Disk Number 1
Photo Number 31
Photo Filename DSCN1091.JPG
Date/Time 5/4/2017 1:14:00 PM
Photographer Jamie Paulin

Description

Storage of "heavies." One 55-gallon container was labeled as sulfuric acid. SFS01. Sampled 1:06pm. Level of contents was 2 inches. pH paper showed pH of 1. 4 aliquots each sample jar. Split taken.



Disk Number 1
Photo Number 32
Photo Filename DSCN1092.JPG
Date/Time 5/4/2017 1:18:00 PM
Photographer Jamie Paulin

Description

Storage of "heavies." One 55-gallon container was labeled as corrosive & flammable. SFS02. Sampled 1:20pm. Level of contents was 3 inches. pH paper showed pH of 8. 4 aliquots each sample jar. Split taken.

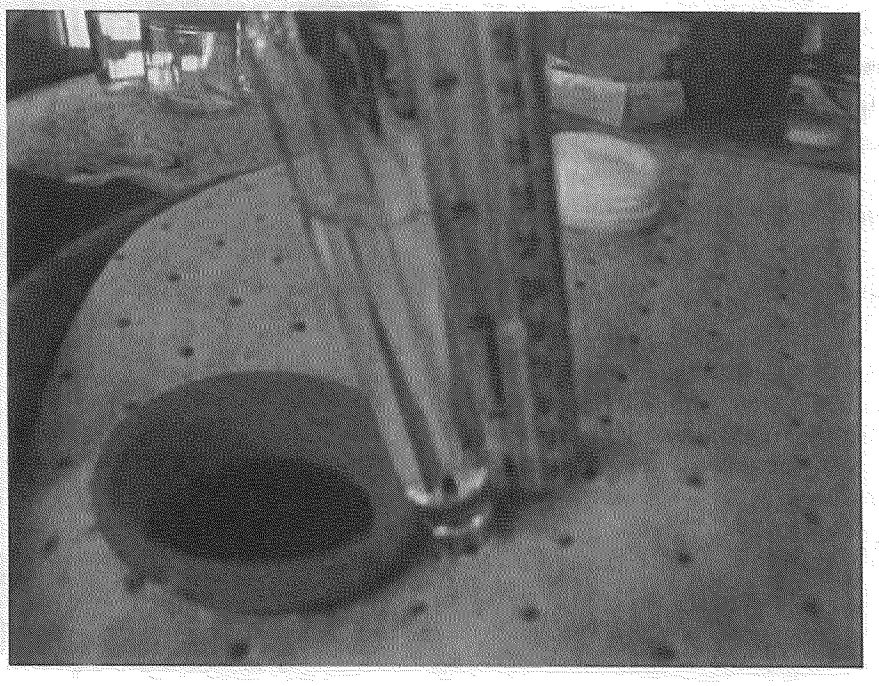
Photographs for MASD St. Francis 5/4/2017

Media: RCRA

Disk Number 1
Photo Number 33
Photo Filename DSCN1093.JPG
Date/Time 5/4/2017 1:20:00 PM
Photographer Jamie Paulin

Description

Storage of "heavies." One 55-gallon container was labeled as corrosive & flammable. SFS02. Sampled 1:20pm. Level of contents was 3 inches. pH paper showed pH of 8. 4 aliquots each sample jar. Split taken.



Disk Number 1
Photo Number 34
Photo Filename DSCN1094.JPG
Date/Time 5/4/2017 1:20:00 PM
Photographer Jamie Paulin

Description

Photograph of working area.

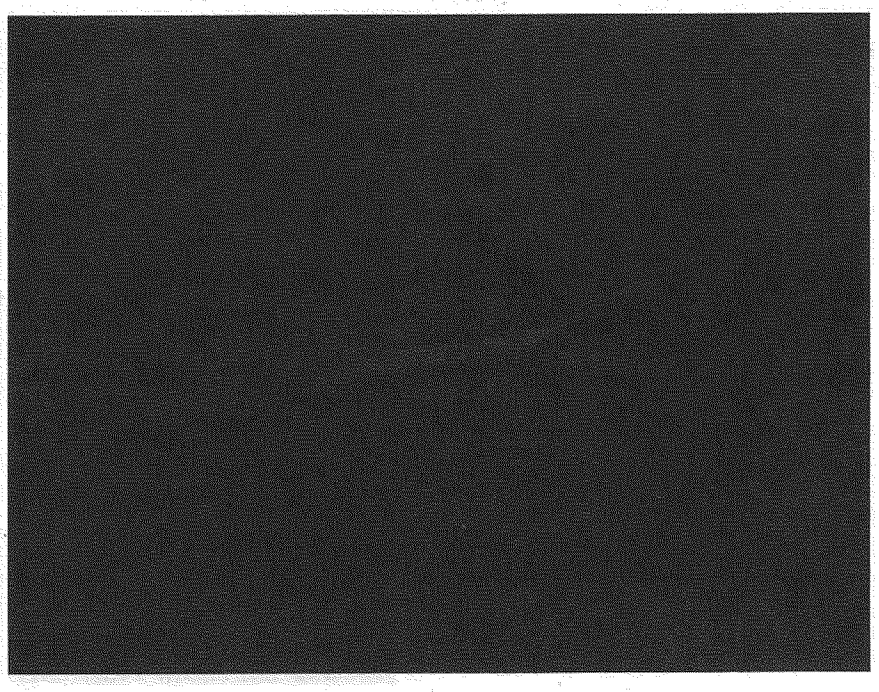
Photographs for MASD St. Francis 5/4/2017

Media: RCRA

Disk Number 1
Photo Number 35
Photo Filename DSCN1095.JPG
Date/Time 5/4/2017 1:21:00 PM
Photographer Jamie Paulin

Description

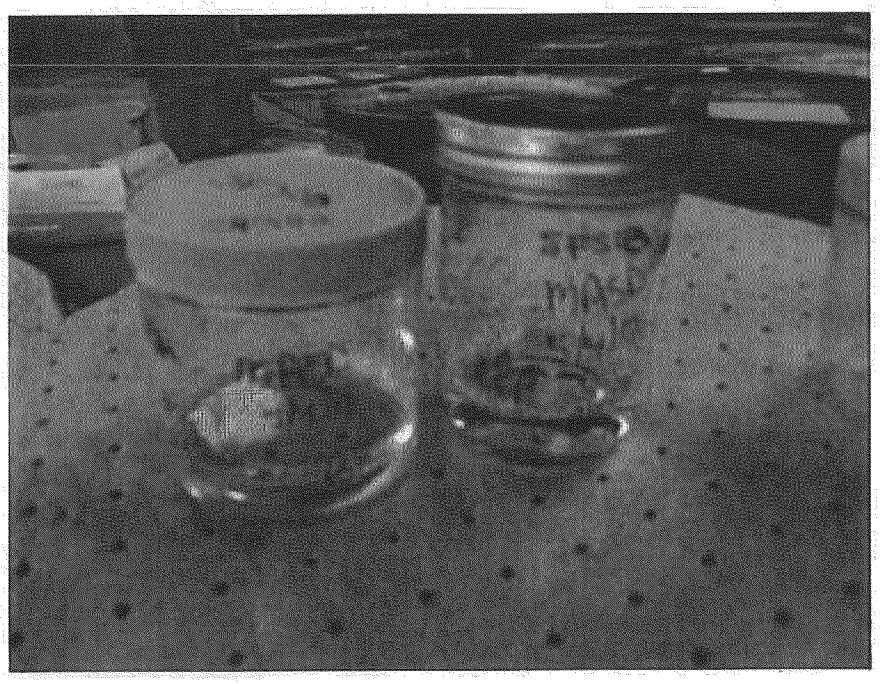
Storage of "heavies." One 55-gallon container was labeled as corrosive & flammable. SFS02. Sampled 1:20pm. Level of contents was 3 inches. pH paper showed pH of 8. 4 aliquots each sample jar. Split taken.



Disk Number 1
Photo Number 36
Photo Filename DSCN1096.JPG
Date/Time 5/4/2017 1:26:00 PM
Photographer Jamie Paulin

Description

Storage of "heavies." One 55-gallon container was labeled as corrosive & flammable. SFS02. Sampled 1:20pm. Level of contents was 3 inches. pH paper showed pH of 8. 4 aliquots each sample jar. Split taken.



Photographs for MASD St. Francis 5/4/2017

Media: RCRA

Disk Number 1
Photo Number 37
Photo Filename DSCN1097.JPG
Date/Time 5/4/2017
1:30:00 PM
Photographer Jamie Paulin

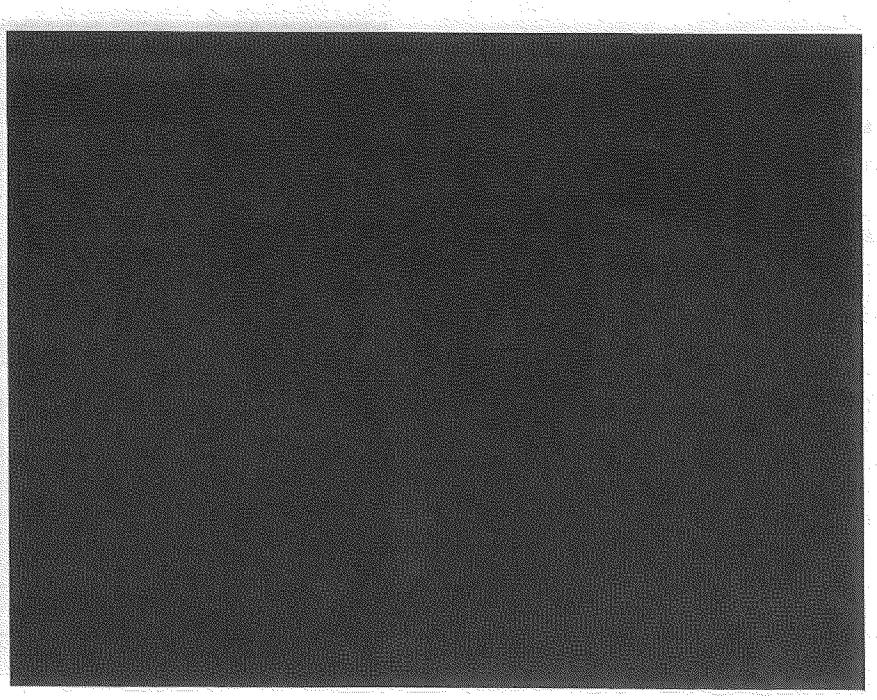
Description

Storage of "heavies." One 55-gallon container was labeled as MDG ZymoBac GTLS 10x. SFS03. Sampled 1:31pm. Level of contents was 2.5 inches. pH paper showed pH of 6. 4 aliquots each sample jar. Split taken.

Disk Number 1
Photo Number 38
Photo Filename DSCN1098.JPG
Date/Time 5/4/2017
1:34:00 PM
Photographer Jamie Paulin

Description

Storage of "heavies." One 55-gallon container was labeled as MDG ZymoBac GTLS 10x. SFS03. Sampled 1:31pm. Level of contents was 2.5 inches. pH paper showed pH of 6. 4 aliquots each sample jar. Split taken.



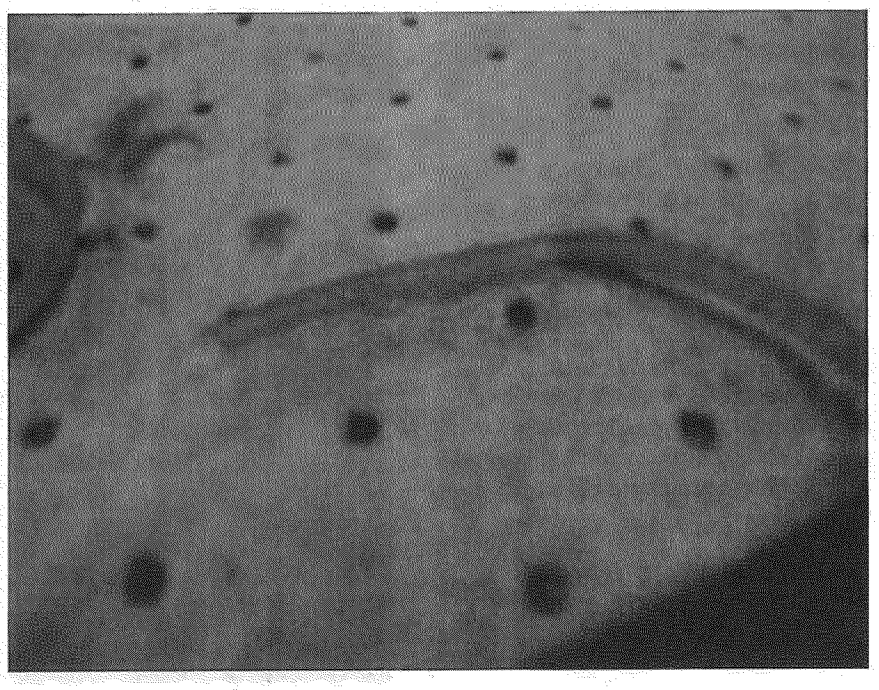
Photographs for MASD St. Francis 5/4/2017

Media: RCRA

Disk Number 1
Photo Number 39
Photo Filename DSCN1099.JPG
Date/Time 5/4/2017 1:35:00 PM
Photographer Jamie Paulin

Description

Storage of "heavies." One 55-gallon container was labeled as MDG ZymoBac GTLS 10x. SFS03. Sampled 1:31pm. Level of contents was 2.5 inches. pH paper showed pH of 6. 4 aliquots each sample jar. Split taken.



Disk Number 1
Photo Number 40
Photo Filename DSCN1100.JPG
Date/Time 5/4/2017 1:38:00 PM
Photographer Jamie Paulin

Description

Storage of "heavies." One 55-gallon container was labeled as MDG ZymoBac GTLS 10x. SFS03. Sampled 1:31pm. Level of contents was 2.5 inches. pH paper showed pH of 6. 4 aliquots each sample jar. Split taken.

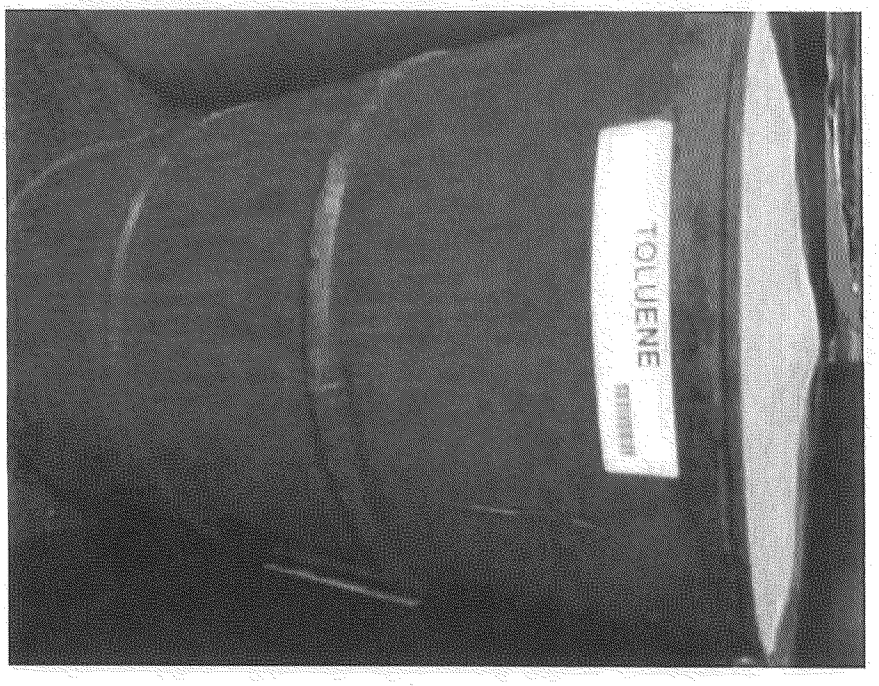
Photographs for MASD St. Francis 5/4/2017

Media: RCRA

Disk Number 1
Photo Number 41
Photo Filename DSCN1101.JPG
Date/Time 5/4/2017 1:40:00 PM
Photographer Jamie Paulin

Description

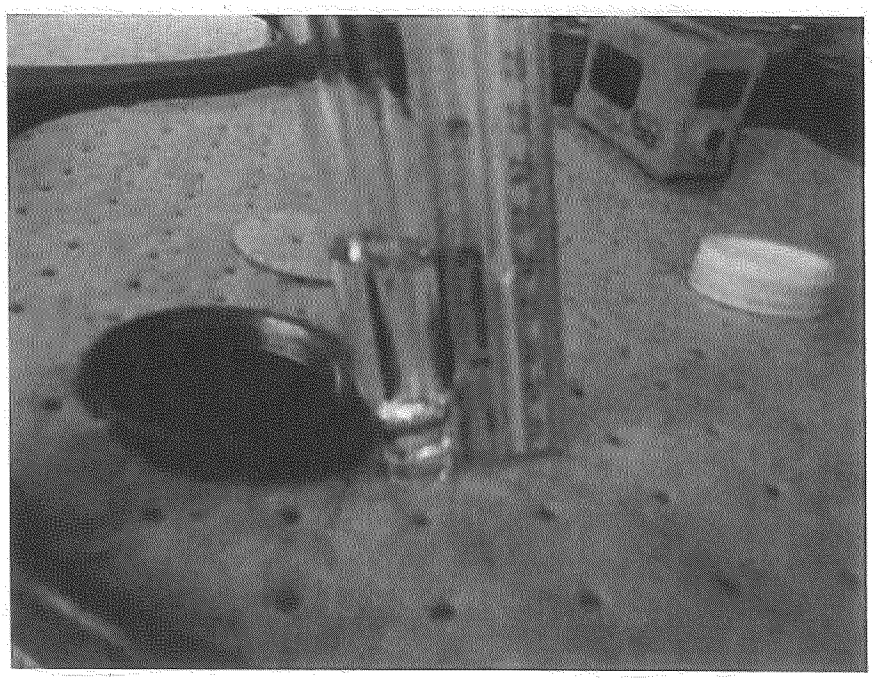
Storage of "heavies." One 55-gallon container was labeled as Toluene. SFS04. Sampled 1:39pm. Level of contents was 2 inches. pH paper showed pH of 6. 4 aliquots each sample jar. 300ppm VOCs on multi-rae. Split taken.



Disk Number 1
Photo Number 42
Photo Filename DSCN1102.JPG
Date/Time 5/4/2017 1:42:00 PM
Photographer Jamie Paulin

Description

Storage of "heavies." One 55-gallon container was labeled as Toluene. SFS04. Sampled 1:39pm. Level of contents was 2 inches. pH paper showed pH of 6. 4 aliquots each sample jar. 300ppm VOCs on multi-rae. Split taken.



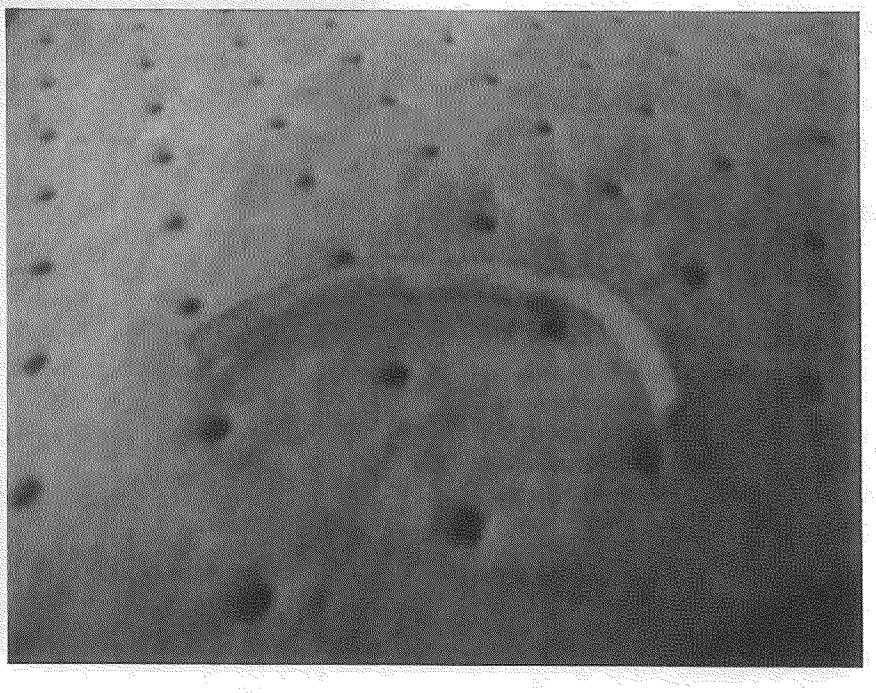
Photographs for MASD St. Francis 5/4/2017

Media: RCRA

Disk Number 1
Photo Number 43
Photo Filename DSCN1103.JPG
Date/Time 5/4/2017 1:43:00 PM
Photographer Jamie Paulin

Description

Storage of "heavies." One 55-gallon container was labeled as Toluene. SFS04. Sampled 1:39pm. Level of contents was 2 inches. pH paper showed pH of 6. 4 aliquots each sample jar. 300ppm VOCs on multi-rae. Split taken.



Disk Number 1
Photo Number 44
Photo Filename DSCN1104.JPG
Date/Time 5/4/2017 1:47:00 PM
Photographer Jamie Paulin

Description

Storage of "heavies." One 55-gallon container was labeled as Toluene. SFS04. Sampled 1:39pm. Level of contents was 2 inches. pH paper showed pH of 6. 4 aliquots each sample jar. 300ppm VOCs on multi-rae. Split taken.

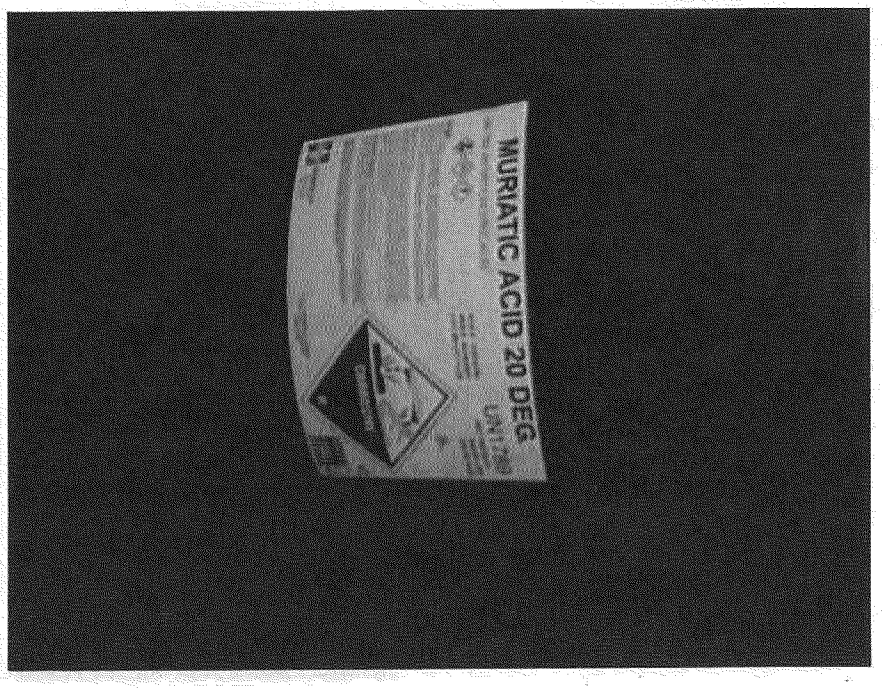
Photographs for MASD St. Francis 5/4/2017

Media: RCRA

Disk Number 1
Photo Number 45
Photo Filename DSCN1105.JPG
Date/Time 5/4/2017 1:48:00 PM
Photographer Jamie Paulin

Description

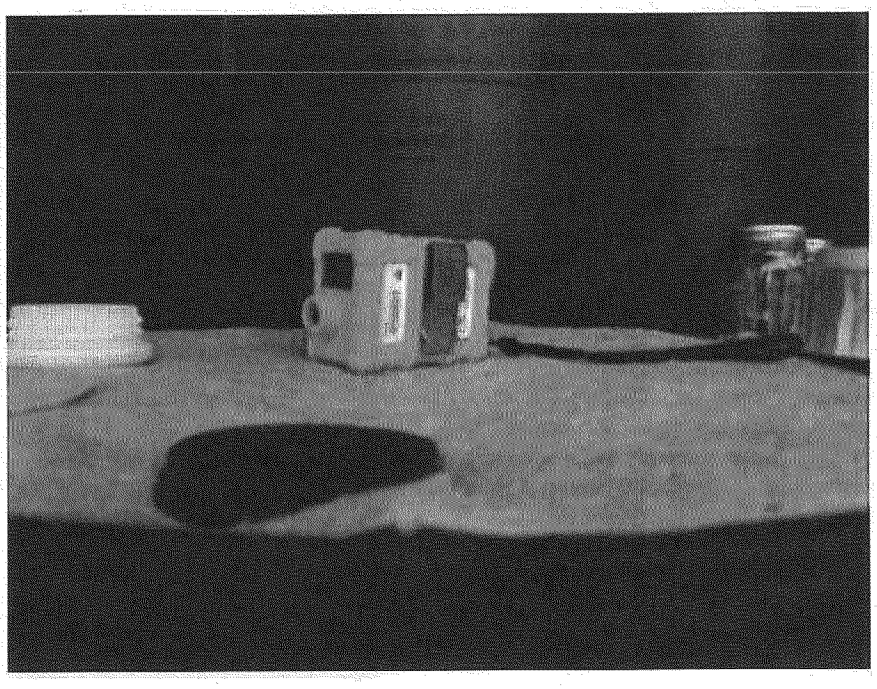
Storage of "heavies." One 55-gallon container was labeled as Muriatic Acid. SFS05. Tried to sample at 1:46pm. When drum was opened, the drum began to fume/smoke. We did not take a sample for safety purposes. The fumes turned the pH paper red, pH of 1.



Disk Number 1
Photo Number 46
Photo Filename DSCN1106.JPG
Date/Time 5/4/2017 1:51:00 PM
Photographer Jamie Paulin

Description

Storage of "heavies." One 55-gallon container was labeled as Muriatic Acid. SFS05. Tried to sample at 1:46pm. When drum was opened, the drum began to fume/smoke. We did not take a sample for safety purposes. The fumes turned the pH paper red, pH of 1.



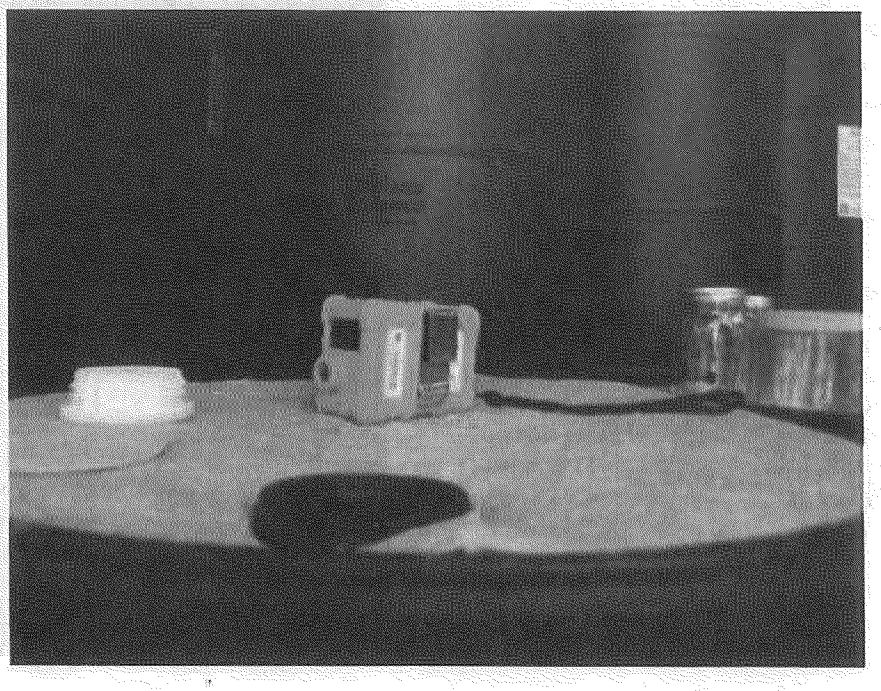
Photographs for MASD St. Francis 5/4/2017

Media: RCRA

Disk Number 1
Photo Number 47
Photo Filename DSCN1107.JPG
Date/Time 5/4/2017 1:51:00 PM
Photographer Jamie Paulin

Description

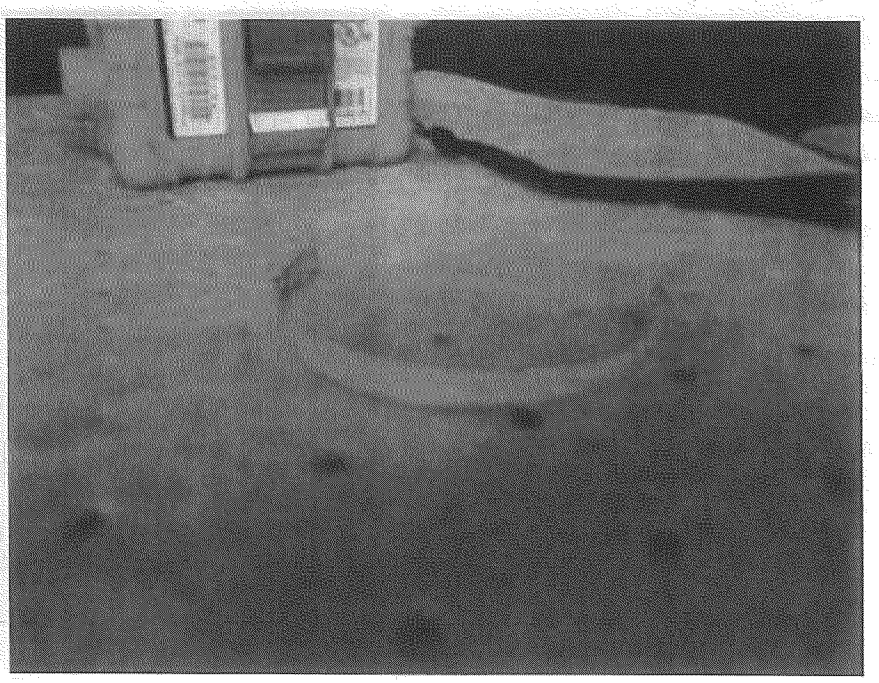
Storage of "heavies." One 55-gallon container was labeled as Muriatic Acid. SFS05. Tried to sample at 1:46pm. When drum was opened, the drum began to fume/smoke. We did not take a sample for safety purposes. The fumes turned the pH paper red, pH of 1.



Disk Number 1
Photo Number 48
Photo Filename DSCN1108.JPG
Date/Time 5/4/2017 1:52:00 PM
Photographer Jamie Paulin

Description

Storage of "heavies." One 55-gallon container was labeled as Muriatic Acid. SFS05. Tried to sample at 1:46pm. When drum was opened, the drum began to fume/smoke. We did not take a sample for safety purposes. The fumes turned the pH paper red, pH of 1.



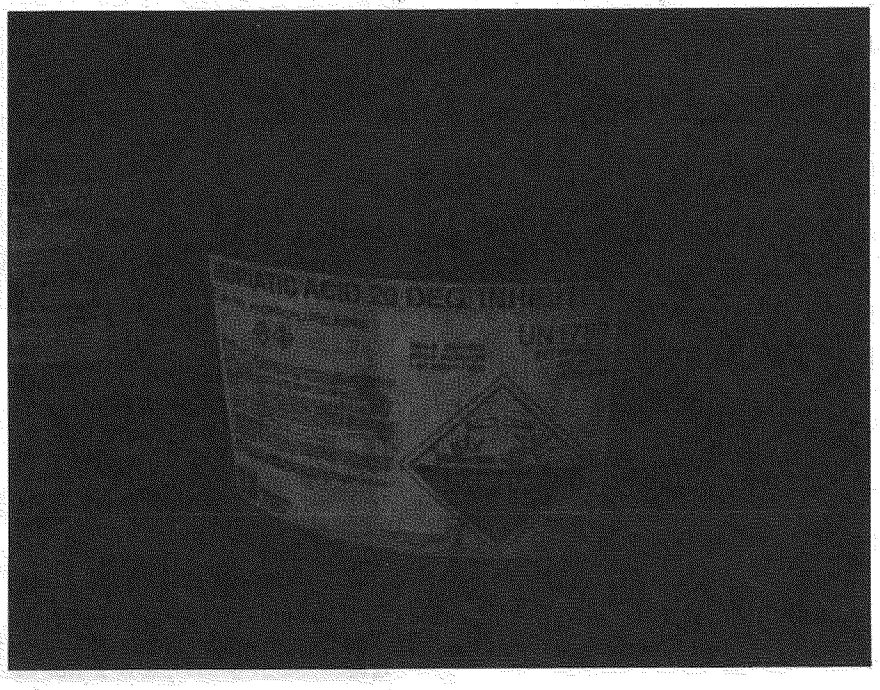
Photographs for MASD St. Francis 5/4/2017

Media: RCRA

Disk Number 1
Photo Number 49
Photo Filename DSCN1109.JPG
Date/Time 5/4/2017 1:55:00 PM
Photographer Jamie Paulin

Description

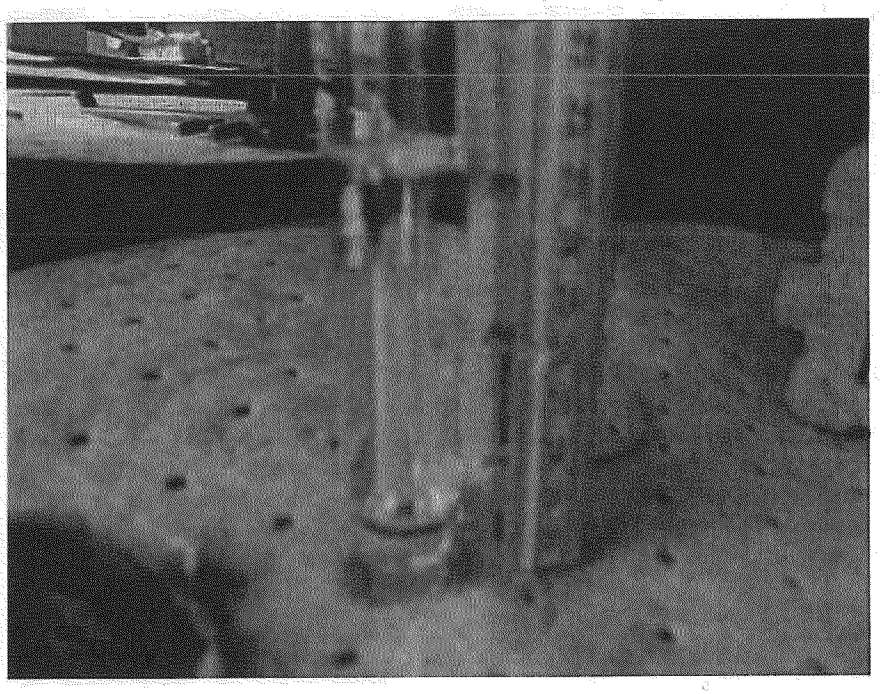
Storage of "heavies." One 55-gallon container was labeled as Muriatic Acid 20 DEG. SFS06. Sampled 1:55pm. Level of contents was 3.2 inches. pH paper showed pH of 1. 4 aliquots each sample jar. Split taken.



Disk Number 1
Photo Number 50
Photo Filename DSCN1110.JPG
Date/Time 5/4/2017 1:58:00 PM
Photographer Jamie Paulin

Description

Storage of "heavies." One 55-gallon container was labeled as Muriatic Acid 20 DEG. SFS06. Sampled 1:55pm. Level of contents was 3.2 inches. pH paper showed pH of 1. 4 aliquots each sample jar. Split taken.



Photographs for MASD St. Francis 5/4/2017

Media: RCRA

Disk Number 1
Photo Number 51
Photo Filename DSCN1111.JPG
Date/Time 5/4/2017 1:58:00 PM
Photographer Jamie Paulin

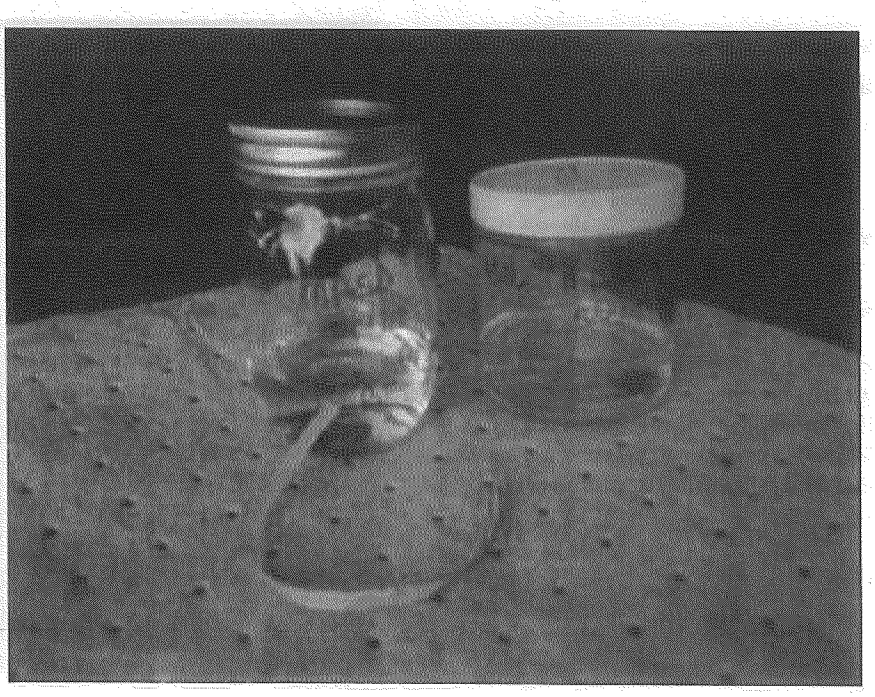
Description

Storage of "heavies." One 55-gallon container was labeled as Muriatic Acid 20 DEG. SFS06. Sampled 1:55pm. Level of contents was 3.2 inches. pH paper showed pH of 1. 4 aliquots each sample jar. Split taken.

Disk Number 1
Photo Number 52
Photo Filename DSCN1112.JPG
Date/Time 5/4/2017 2:03:00 PM
Photographer Jamie Paulin

Description

Storage of "heavies." One 55-gallon container was labeled as Muriatic Acid 20 DEG. SFS06. Sampled 1:55pm. Level of contents was 3.2 inches. pH paper showed pH of 1. 4 aliquots each sample jar. Split taken.



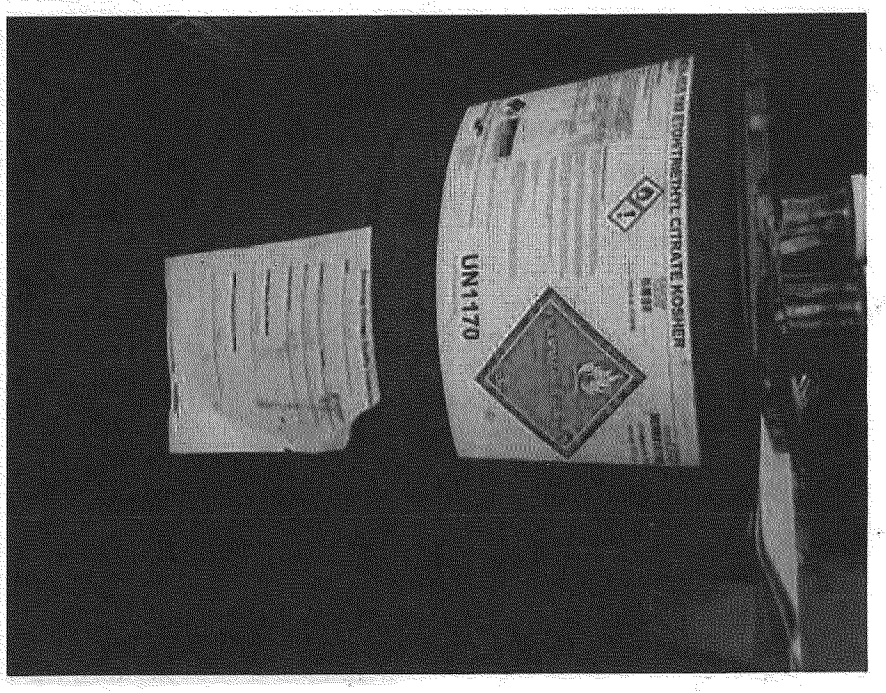
Photographs for MASD St. Francis 5/4/2017

Media: RCRA

Disk Number 1
Photo Number 53
Photo Filename DSCN1113.JPG
Date/Time 5/4/2017 2:04:00 PM
Photographer Jamie Paulin

Description

Storage of "heavies." One 55-gallon container was labeled as ETOH/Triethyl Citrate Kosher. SFS07. Sampled 2:03pm. Level of contents was 2.75 inches. pH paper showed pH of 6. 4 aliquots each sample jar. Split taken.



Disk Number 1
Photo Number 54
Photo Filename DSCN1114.JPG
Date/Time 5/4/2017 2:07:00 PM
Photographer Jamie Paulin

Description

Storage of "heavies." One 55-gallon container was labeled as ETOH/Triethyl Citrate Kosher. SFS07. Sampled 2:03pm. Level of contents was 2.75 inches. pH paper showed pH of 6. 4 aliquots each sample jar. Split taken.

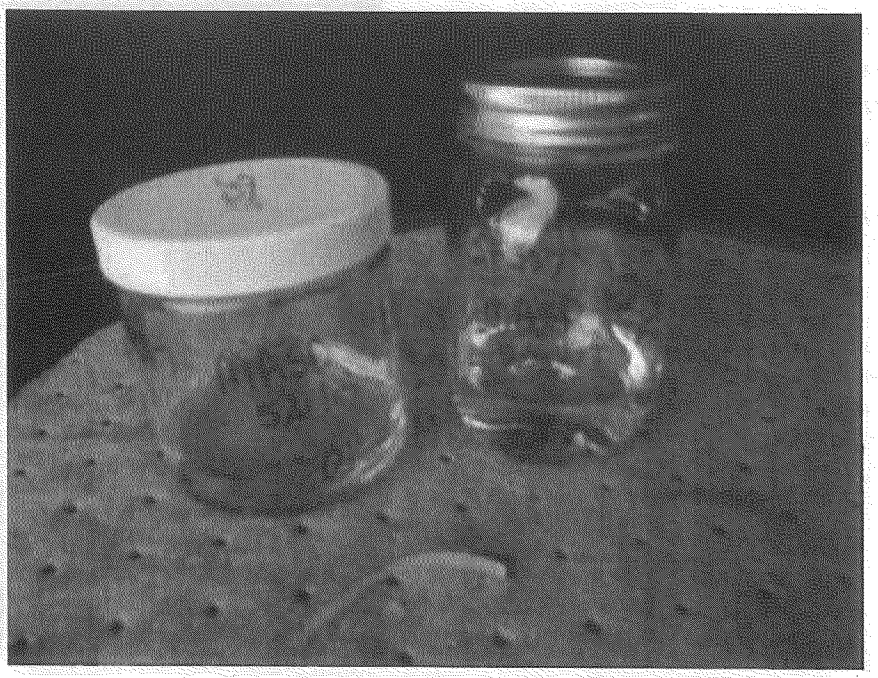
Photographs for MASD St. Francis 5/4/2017

Media: RCRA

Disk Number 1
Photo Number 55
Photo Filename DSCN1115.JPG
Date/Time 5/4/2017
2:11:00 PM
Photographer Jamie Paulin

Description

Storage of "heavies." One 55-gallon container was labeled as ETOH/Triethyl Citrate Kosher. SFS07. Sampled 2:03pm. Level of contents was 2.75 inches. pH paper showed pH of 6. 4 aliquots each sample jar. Split taken.



Disk Number 1
Photo Number 56
Photo Filename DSCN1116.JPG
Date/Time 5/4/2017
2:56:00 PM
Photographer Jamie Paulin

Description

Storage of "heavies." One 55-gallon container was labeled as Non Hazardous Waste. SFS08. Sampled 3:10pm. Full contents. pH paper showed pH of 10. 8 aliquots each sample jar. 4 x 16 oz sample jars were filled. Split taken.

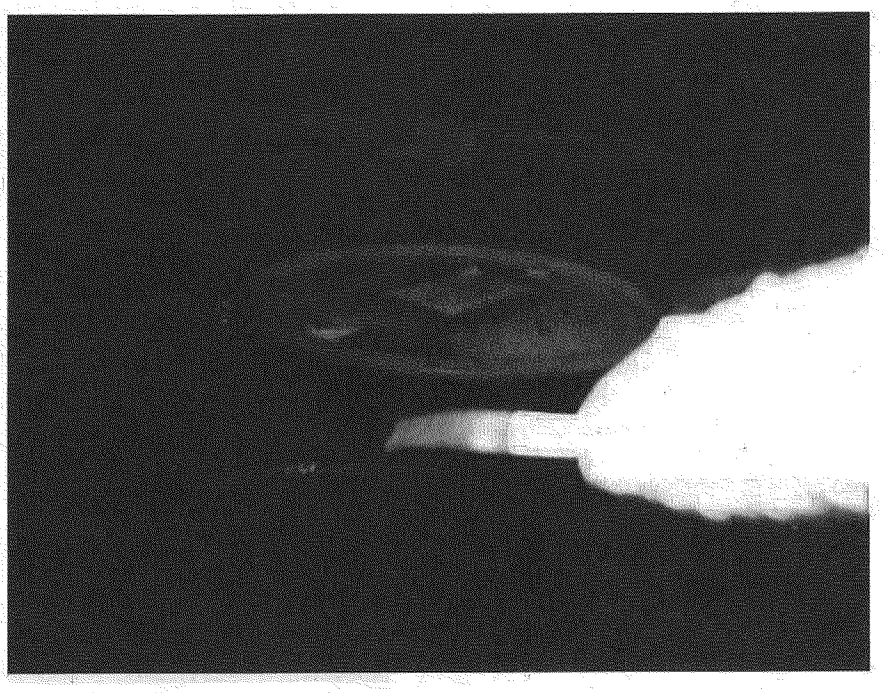
Photographs for MASD St. Francis 5/4/2017

Media: RCRA

Disk Number 1
Photo Number 57
Photo Filename DSCN1117.JPG
Date/Time 5/4/2017 3:01:00 PM
Photographer Jamie Paulin

Description

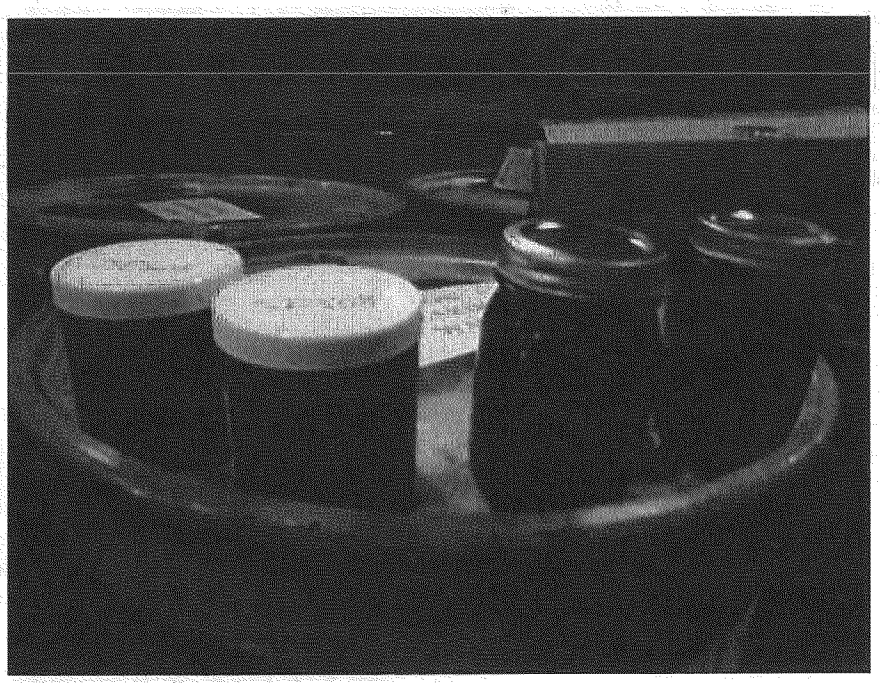
Storage of "heavies." One 55-gallon container was labeled as Non Hazardous Waste. SFS08. Sampled 3:10pm. Full contents. pH paper showed pH of 10. 8 aliquots each sample jar. 4 x 16 oz sample jars were filled. Split taken.



Disk Number 1
Photo Number 58
Photo Filename DSCN1118.JPG
Date/Time 5/4/2017 3:17:00 PM
Photographer Jamie Paulin

Description

Storage of "heavies." One 55-gallon container was labeled as Non Hazardous Waste. SFS08. Sampled 3:10pm. Full contents. pH paper showed pH of 10. 8 aliquots each sample jar. 4 x 16 oz sample jars were filled. Split taken.



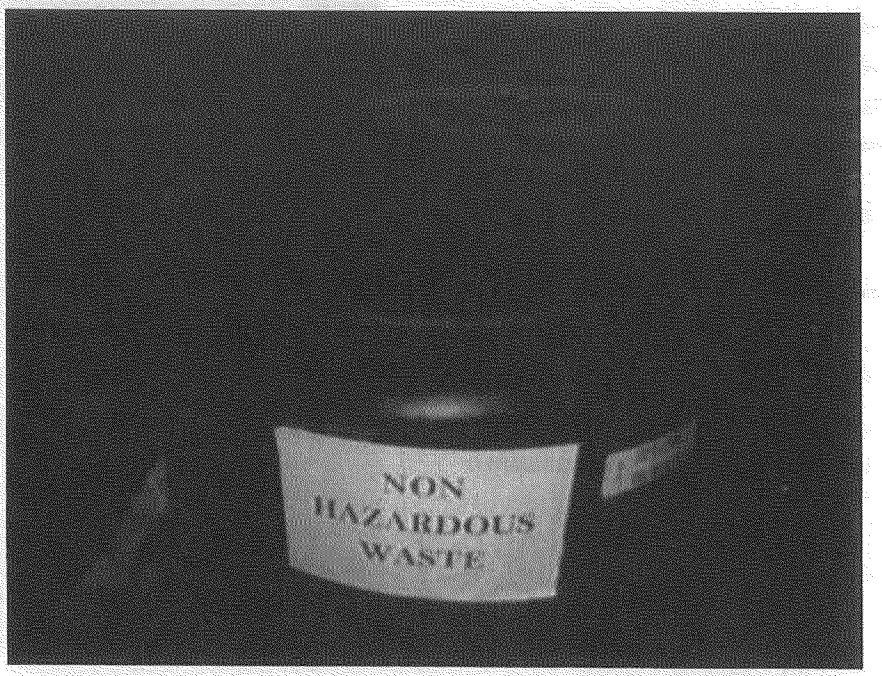
Photographs for MASD St. Francis 5/4/2017

Media: RCRA

Disk Number 1
Photo Number 59
Photo Filename DSCN1119.JPG
Date/Time 5/4/2017
3:17:00 PM
Photographer Jamie Paulin

Description

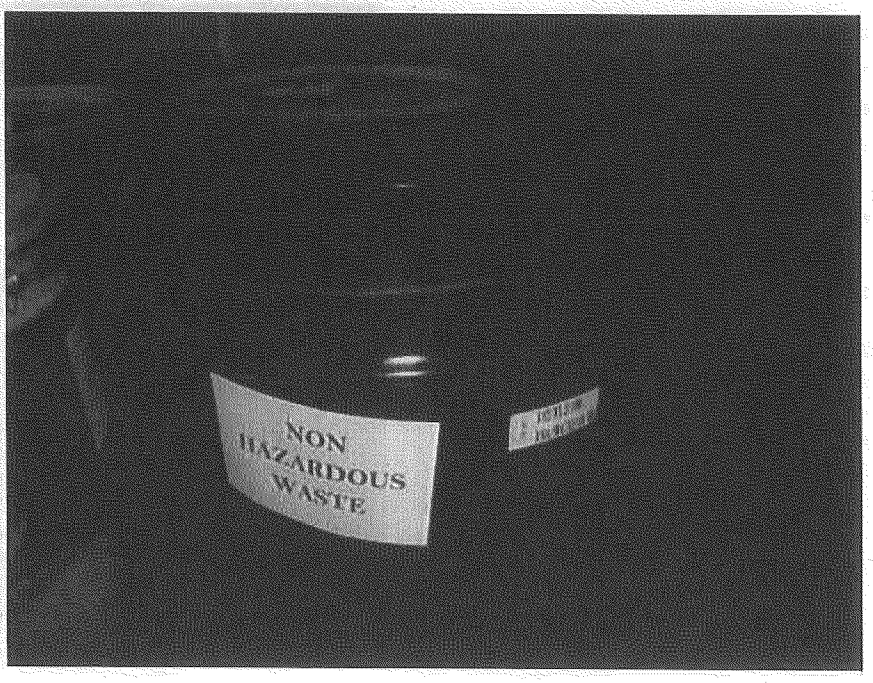
Storage of "heavies." One 55-gallon container was labeled as Non Hazardous Waste. SFS09. Sampled 3:23pm. Full contents. pH paper showed pH of 10. 8 aliquots each sample jar. 4 x 16 oz sample jars were filled. Split taken.



Disk Number 1
Photo Number 60
Photo Filename DSCN1120.JPG
Date/Time 5/4/2017
3:19:00 PM
Photographer Jamie Paulin

Description

Storage of "heavies." One 55-gallon container was labeled as Non Hazardous Waste. SFS09. Sampled 3:23pm. Full contents. pH paper showed pH of 10. 8 aliquots each sample jar. 4 x 16 oz sample jars were filled. Split taken.



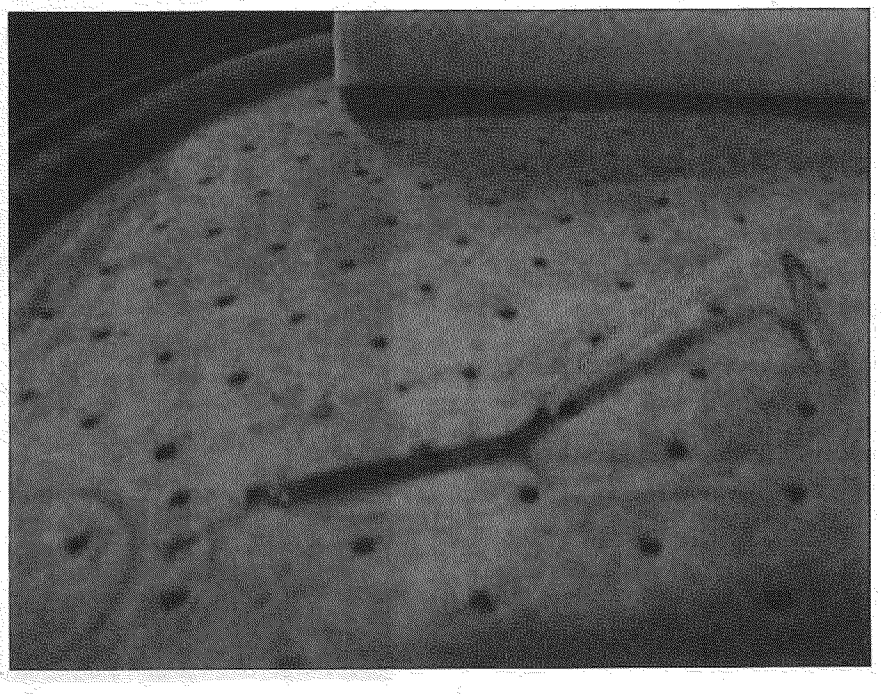
Photographs for MASD St. Francis 5/4/2017

Media: RCRA

Disk Number 1
Photo Number 61
Photo Filename DSCN1121.JPG
Date/Time 5/4/2017 3:23:00 PM
Photographer Jamie Paulin

Description

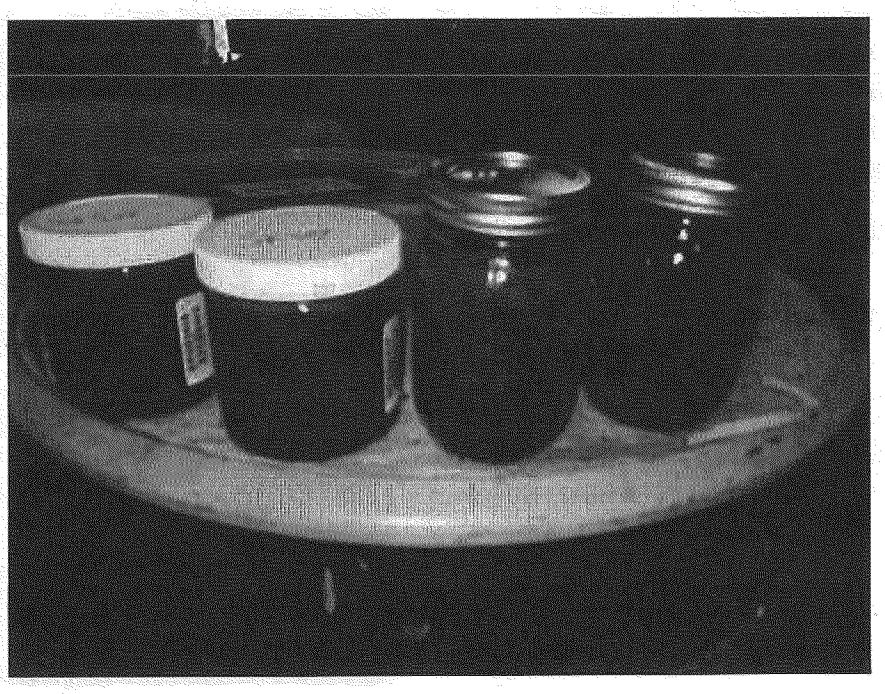
Storage of "heavies." One 55-gallon container was labeled as Non Hazardous Waste. SFS09. Sampled 3:23pm. Full contents. pH paper showed pH of 10. 8 aliquots each sample jar. 4 x 16 oz sample jars were filled. Split taken.



Disk Number 1
Photo Number 62
Photo Filename DSCN1122.JPG
Date/Time 5/4/2017 3:31:00 PM
Photographer Jamie Paulin

Description

Storage of "heavies." One 55-gallon container was labeled as Non Hazardous Waste. SFS09. Sampled 3:23pm. Full contents. pH paper showed pH of 10. 8 aliquots each sample jar. 4 x 16 oz sample jars were filled. Split taken.



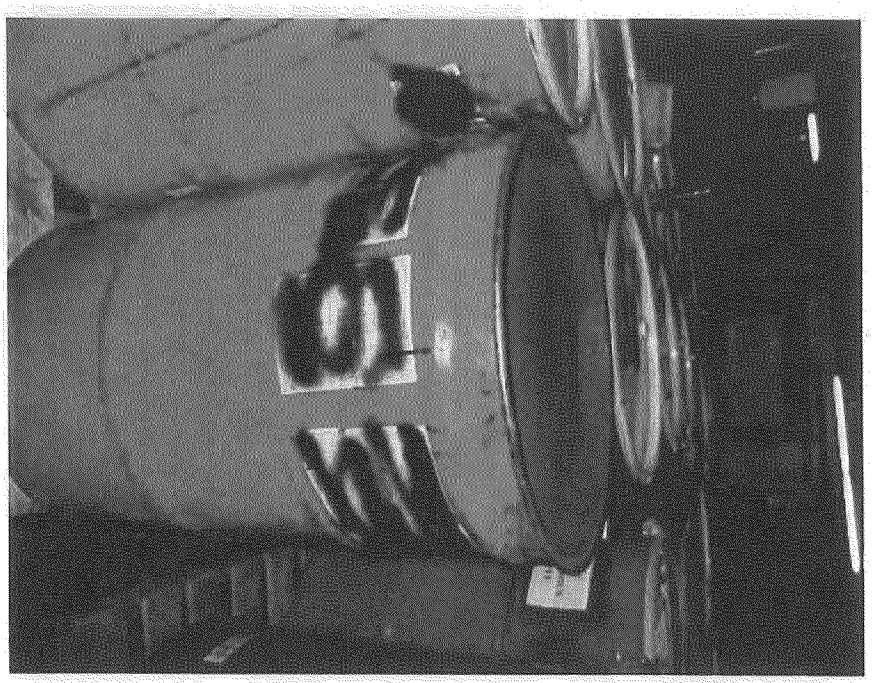
Photographs for MASD St. Francis 5/4/2017

Media: RCRA

Disk Number 1
Photo Number 63
Photo Filename DSCN1123.JPG
Date/Time 5/4/2017 3:37:00 PM
Photographer Jamie Paulin

Description

Storage of "heavies." One 55-gallon container was labeled as Non Hazardous Waste. SFS10. Sampled 3:37pm. Full contents. 3 scoops each sample jar. 4 x 16 oz sample jars were filled. Split taken. Duplicate taken.



Disk Number 1
Photo Number 64
Photo Filename DSCN1124.JPG
Date/Time 5/4/2017 3:43:00 PM
Photographer Jamie Paulin

Description

Storage of "heavies." One 55-gallon container was labeled as Non Hazardous Waste. SFS10. Sampled 3:37pm. Full contents. 3 scoops each sample jar. 4 x 16 oz sample jars were filled. Split taken. Duplicate taken.

U.S. Environmental Protection Agency
Region 5

RECEIPT FOR SAMPLES

Name of Facility	Project Number
Mid-America Steel Drum St. Francis, WI	MASD-05-04-17
Facility Location	3950 S. Pennsylvania Ave. St. Francis, WI 53235

DESCRIPTION

Six drum heavies – Flash point + pH

Two drum sludges near WWTU – Flash point, pH, TCLP Metals, TCLP Hg, TCLP VOCs, TCLP SVOCs

One drum dust – Flash point, pH, TCLP Metals, TCLP Hg, TCLP VOCs, TCLP SVOCs

Facility Representative (signature)		EPA Representative (signature)	
Name (print) Mark Kucbash		Name (print) Brian Kennedy	
Title Site Manager	Date Signed 3-4-17	Title RCRA Enf. Officer	Date Signed 5/4/17

Distribution: Original to Facility Representative; Copy to Project File